



MICHAEL S. REGAN

MICHAEL A. ABRACZINSKAS

Acting Director

November ##, 2017

Colonel Clarence T. Harper III Commanding Officer Fleet Readiness Center East PSC Box 8021 Cherry Point, N.C. 28533

SUBJECT: Air Quality Permit No. 05506T44

Facility ID: 2500159 Fleet Readiness Center East Cherry Point, North Carolina

Craven County Fee Class: Title V PSD Status: Major

#### Dear Colonel Harper III:

In accordance with your completed Air Quality Permit Applications for Renewal of your Title V permit received January 28, 2016, for significant modification received February 12, 2016, for 502(b)(10) received April 25, 2016, and for a minor modification received July 12, 2016, we are forwarding herewith Air Quality Permit No. 05506T44 to Fleet Readiness Center East, Cherry Point, Craven County, North Carolina authorizing the construction and operation of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been listed for informational purposes as an "ATTACHMENT." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

As the designated responsible official, it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the conditions of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested.

This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with both the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing. Unless a request for a hearing

Mr. Colonel Harper III November ##, 2017 Page 2

is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in <u>writing</u> to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215-108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Craven County has not triggered increment tracking under PSD for any pollutants, so no tracking is required.

This Air Quality Permit shall be effective from November ##, 2017 until October 31, 2022, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Should you have any questions concerning this matter, please contact Richard R. Simpson, at (919) 707-8476 or <a href="mailto:Richard.Simpson@ncdenr.gov">Richard.Simpson@ncdenr.gov</a>.

Sincerely yours,

William D. Willets, P.E., Chief, Permitting Section Division of Air Quality, NCDEQ

#### Enclosure

c: Heather Ceron - EPA Region IV
 Rob Fisher, Supervisor, Washington Regional Office
 Central Files
 Connie Horne (cover letter only)

### Insignificant Activities under 15A NCAC 02Q .0503(8)

Al Dl	(-11)
Abrasive Blasting Bldg. 3767	(glovebox) ID0228 (dust collector with dry particulate and HEPA filter CD-D0228)
Adhesive Coating	
Bldg. 4037	ID0199
Bonding & Curin	
Bldg. 4224	IB0063, IB0064
C	ng (paint stripping tank) [MACT GG]
Bldg. 4032	IA0139
Desoldering (stati	
Bldg. 137	IC0058
	ency) [MACT ZZZZ]
Bldg. 83	IC0105 diesel-fired (102 hp)
Bldg. 137 Bldg. 488	IC0099 diesel-fired (99 hp), IC0100 diesel-fired (490 hp) IC0141 diesel-fired (99 hp)
Bldg. 1006	IC0102 diesel-fired (115 hp)
Bldg. 4032	IC0104 diesel-fired (117 hp)
Bldg. 4224	IC0103 diesel-fired (354 hp)
Bldg. 4225	IE0188 diesel-fired (99 hp)
Grinding & Sandi	ing (starters, APUs, blades, blending, vacuum maint.) **All dust collectors have dry particulate and HEPA
filters**	
Bldg. 137	ID0037, ID0038, ID0041 (fugitive)
Bldg. 137	ID0141 (dust collector CD-D0141), ID0168 (dust collector CD-D0168), ID0169 (dust collector CD-D0169),
D14- 4172	ID0227 (dust collector CD-D0227)
Bldg. 4173	[IB0137, IB0138 (dust collector CD-B0137)], [IB0139, IB0140 (cyclone CD-B0139)], [IB0141, IB0142 (dust collector CD-B0141)]
Bldg. 4225	[IE0190, IE0191, IE0192, IE0193 (cyclone CD-E0190)],
Diag. 4223	[IE0194, IE0195, IE0196, IE0197 (dust collector CD-E0194)],
	[IE0198, IE0199, IE0200, IE0201 (dust collector CD-E0198)]
Bldg. 4808	ID0218 (dust collector CD-D0218)
Heater (exchange	
Bldg. 137	ID0113 [*Case by Case MACT and MACT DDDDD], [5.9 million BTU/hr, with JP5-fired]
	ID0114 [*Case by Case MACT and MACT DDDDD], [5.9 million BTU/hr, with JP5-fired]
Bldg. 1798	IH0001 and IH0002 [both are rated at 4.1 million BTU/hr each, propane-fired, and direct contact]
D1da 2402	IH0003 [0.75 million BTU/hr, propane-fired and direct contact]
Bldg. 3402 Bldg. 4032	IA0075 [6.2 million BTU/hr, propane-fired and direct contact] IH0004 [3.3 million BTU/hr, propane-fired and direct contact]
Diag. 4032	IH0005 [*Case by Case MACT and MACT DDDDD], [0.15 million BTU/hr, propane-fired]
Lab Process (cutt	ing, grinding, painting)
Bldg. 4032	IA0049, IA0117, IA0175 (dry particulate filter system CD-A0175)
Metal Coating (el	ectrophoretic)
Bldg. 4225	IE0090, IE0091, IE0187
Metal Working (c	
Bldg. 137	IC0034, IC0035, IC0036, IC0042, IC0142
	Inspection (penetrant line)
Bldg. 133 Bldg. 137	IA0130, IE0001, IE0086 ID0042
Bldg. 4032	IA0138
Bldg. 4225	IE0083
	s (propane quench) [*Case by Case MACT and MACT DDDDD]
Bldg. 137	IC0017 [0.2 million BTU/hr, propane-fired]
	Cleaning (enclosed machine) [MACT GG]
Bldg. 133	IC0086
Bldg. 137	IC0082, IC0083
Bldg. 245	IC0084, IC0085, IC0120
Bldg. 1798 Bldg. 4032	IC0119 IC0121
Diag. 4032	ICV121

	aqueous) [MACT GG]
Bldg. 133	IA0141, IB0123, IE0012
Bldg. 137	IC0071, ID0028, ID0078
Bldg. 4032	IA0135, IC0088
Bldg. 4035	IP0014
Process Tanks (o	open top) [various MACT GG]
Bldg. 133	IB0033, IB0066, IB0067, IB0068, IB0069, IB0070, IB0071, IB0072, IB0073, IB0074, IB0075, IB0076,
Diag. 133	IB0078, IB0079, IB0080, IB0081 (bearings)
Bldg. 133	IE0013, IE0014, IE0015, IE0016, IE0017, IE0018, IE0019, IE0020, IE0021, IE0022, IE0172 (clean shop)
Bldg. 133	IA0022, IA0023, IA0026, IA0027, IA0028, IA0029 (paint shop)
Bldg. 137	IA0190, ID0023, ID0024, ID0029, ID0030, ID0076, ID0077 (clean shop)
Bldg. 4035	IT0001, IT0009, IT0026, IT0031, IT0032, IT0033, IT0041 (vertical spray tower scrubber AOH1)
Bldg. 4035	IT0053, IT0059, IT0062, IT0063, IT0068, IT0070, IT0072, IT0078 (vertical packed bed scrubber AOH2)
Bldg. 4035	IT0107, IT0108, IT0117, IT0124 (vertical packed bed scrubber AOH3)
Bldg. 4035	IT0151, IT0153, IT0157, IT0158, IT0168A, IT0178, IT0181, IT0192, IT0195 (vertical packed bed
	scrubber AOH4)
Bldg. 4035	IT0003, IT0005, IT0006, IT0052, IT0162, IT0163 (vertical packed bed scrubber CR1)
Bldg. 4035	IT0049, IT0051, IT0079, IT0085, IT0086, IT0090, IT0201 (vertical spray tower scrubber OH1)
Bldg. 4035	IT0008 (exhaust NEF01)
Bldg. 4035	IT0036, IT0037, IT0039 (exhaust NEF03)
Bldg. 4035	IT0040, IT0042 (exhaust NEF04)
Bldg. 4035	IT0077, IT0081 (exhaust NEF05)
Bldg. 4035 Bldg. 4035	IT0211 (exhaust NEF06)
Bldg. 4035	IT0132, IT0212, IT0213, IT0217 (exhaust NEF08) IT0146 (exhaust NEF09)
Bldg. 4035	IT0134, IT0135, IT0139, IT0141, IT0147 (exhaust NEF10)
Bldg. 4035	IT0160, IT0164, IT0166, IT0169, IT0170, IT0173, IT0176 (exhaust NEF11)
Bldg. 4035	IT0189, IT0191, IT0204, IT0205, IT0207, IT0208 (exhaust NEF12)
Bldg. 4035	IT0002, IT0004, IT0007, IT0010, IT0011, IT0012, IT0027, IT0028, IT0029, IT0030, IT0034, IT0035,
C	IT0038, IT0043, IT0044, IT0045, IT0046, IT0047, IT0048, IT0050, IT0054, IT0056, IT0057, IT0058,
	IT0060, IT0061, IT0064, IT0065, IT0066, IT0067, IT0069, IT0071, IT0073, IT0075, IT0076, IT0080,
	IT0082, IT0083, IT0084, IT0087, IT0091, IT0095, IT0096, IT0097, IT0098, IT0101, IT0102, IT0103,
	IT0104, IT0116, IT0119, IT0120, IT0121, IT0123, IT0125, IT0126, IT0128, IT0129, IT0130, IT0133,
	IT0136, IT0137, IT0138, IT0140, IT0142, IT0143, IT0144, IT0145, IT0148, IT0149, IT0152, IT0154,
	IT0156, IT0159, IT0161, IT0165, IT0167, IT0168B, IT0171, IT0172, IT0174, IT0175, IT0177, IT0179,
	IT0180, IT0182, IT0183, IT0185, IT0186, IT0190, IT0193, IT0194, IT0196, IT0197, IT0198, IT0199,
D11 4225	IT0200, IT0202, IT0209, IT0210, IT0219, IT0220 (fugitive)
Bldg. 4225	IE0096, IE0098, IE0099, IE0101, IE0103, IE0105, IE0107, IE0108, IE0118, IE0120, IE0121, IE0131, IE0122, IE0124, IE0141, IE0142, IE0147, (horizontal problem of a problem of the complete of th
Bldg. 4225	IE0133, IE0134, IE0141, IE0142, IE0145, IE0147 (horizontal packed bed scrubber C1) IE0109, IE0110, IE0112, IE0114, IE0115, IE0117, IE0122, IE0125, IE0127, IE0129, IE0135, IE0137,
Diug. 4223	IE0139, IE0140, IE0144 (horizontal demister scrubber C2)
Bldg. 4225	IE0097, IE0100, IE0102, IE0104, IE0106, IE0111, IE0113, IE0116, IE0119, IE0123, IE0124, IE0126,
Blug. 4223	IE0128, IE0130, IE0132, IE0136, IE0138, IE0143, IE0146 (fugitive)
Pump (backup w	rater) [MACT ZZZZ]
Bldg. 4225	IE0073 diesel-fired (15 hp)
Soldering (station	
Bldg. 137	IC0054, IC0055, IC0079, ID0175
	g (vapor degreasing, spray booth, steam shelter, station) [MACT GG]
Bldg. 133	IA0197, IE0006, IE0011, IE0081, IE0095
Bldg. 137	IC0002, IC0004, IC0006, IC0050, ID0021, ID0039
Bldg. 1798	ID0054
Bldg. 4032	IA0125
Bldg. 4035 Bldg. 4173	IP0013 IA0118
Bldg. 4225	IE0179
Diag. 4223	110117

#### Storage Tanks (fuel)

Bldg. 133	IB0085
Bldg. 137	IC0074, IC0075, IC0115
Bldg. 1006	ID0189
Bldg. 4032	IA0153
Bldg. 4188	IA0076 [NSPS Kb]
Welding (booths)	
Bldg. 83	ID0122, ID0123, ID0124, ID0130

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Bldg. 133
            IA0104
Bldg. 137
            IC0011, IC0012, IC0013, IC0014, IC0015, IC0044, IC0045, IC0046, IC0047, IC0048, IC0070
Bldg. 1798
            ID0125, ID0126
Bldg. 4035
            IP0001
Bldg. 4224
            IB0052
Bldg. 4225
            IA0132, IA0133
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- The Permittee shall comply with this CAA §112(j) standard until May 19, 2019. The Permittee shall comply with 40 CFR Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters," beginning May 20, 2019.
- 1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
- 2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit".
- 3. For additional information regarding the applicability of MACT or GACT see the DAQ page titled "Specific Permit Conditions Regulatory Guide." The link to this site is as follows: http://deq.nc.gov/about/divisions/air-quality/air-quality-permits/specific-permit-conditionsregulatory-guide

The following table lists all changes made from previous permit 05506T43:

Page(s)	Section	Description of Change(s)
Cover and	Throughout	Updated all tables, dates, and permit revision numbers.
throughout	Tinougnout	opeated an tables, dates, and permit revision numbers.
Throughout	Throughout	Corrected the regulatory reference from 2D and 2Q to 02D and 02Q.
Throughout	Throughout	Corrected wording change from assure to ensure.
Attachment	Insignificant	Updated the Attachment to have the emission sources grouped as like type
Attachinent 1	Activities	sources instead of sources grouped by Buildings.
Attachment	Insignificant	Updated the Attachment to include the appropriate control device with the
1	Activities	correct emission source.
Attachment	Insignificant	Updated the Attachment to include the fuel and horsepower for all
1	Activities	generators or backup water pumps that is subject to MACT ZZZZ.
Attachment	Insignificant	In Building 83, sources IC0093 (Hot Wax Pot) and ID0057 (Hot Wax
1	Activities	Booth) were deleted since the emission sources are tracked elsewhere.
Attachment	Insignificant	In Building 83, source ID0058 (Welding Booth) was deleted since the
1	Activities	emission source has been removed.
Attachment	Insignificant	In Building 84, source IB0116 (Abrasive Blasting Glovebox) was deleted
1	Activities	since the emission source has been removed.
Attachment	Insignificant	In Building 129, source ID0065 (Hot Wax Booth) was deleted since the
1	Activities	emission source is tracked elsewhere.
Attachment	Insignificant	In Building 133, IE00 and IE0095 descriptions were changed from
1	Activities	"Process Tanks" to "Solvent Cleaning".
Attachment	Insignificant	In Building 133, the following insignificant activities with descriptions
1	Activities	were calculated and reclassified as significant sources per February 2016
		permit modification: IA0178 (Painting-Sermetal Spray Booth) and IB0040
		(Solvent Cleaning Spray Booth). Both are now located in Section 1 and
		Section 2.1 A. and Section 2.1 I. The source ID was updated by deleting
		the "I". A0178 and B0040 are now subject to MACT, Subpart GG.
Attachment	Insignificant	In Building 133, the following Accessory Testing sources were deleted
1	Activities	since there are no emissions: IE0040, IE0042, IE0044, IE0047, IE0049,
		IE0050, IE0051, IE0052, IE0053, IE0054, IE0055, IE0056, IE0057,
		IE0058, IE0059, IE0060, IE0061, IE0062, IE0063, IE0065, IE0066,
		IE0067, IE0068, IE0069, IE0070, IE0071, IE0072, IE0078, IE0079,
		IE0085, IE0094, IE0161, IE0162, IE0163, IE0166, IE0167, IE0168,
Attachment	Incignificant	IE0169, IE0170, IE0182, IE0183, IE0184, IE0185, and IE0186. In Building 133, sources IB0050 (Metal Coating Ivadizer), IA0201
Attachment 1	Insignificant Activities	(Mixing Booth), ID0043, ID0082, and IE0005 (NDI Processes) were
1	ACHVILLES	deleted since they are tracked elsewhere.
Attachment	Insignificant	In Building 133, sources IE0002, IE0003, and IE 0004 (NDI Processes)
1	Activities	were deleted since they are combined with IE0001. Source description for
	11011,11100	IE0001 was updated from "Fluorescent Penetrant Tank" to "NDI Line".
Attachment	Insignificant	In Building 133, the following Electric Oven sources were deleted since
1	Activities	there are no emissions: IA0006, IA0008, IA0013, IA0014, IA0015,
		IA0074, IA0199, IA0200, IA0202, IA0203, IB0048, IB0077, IB0082,
		IB0088, IB0103, IB0104, IB0130, IB0131, IB0133, and IB0134.
Attachment	Insignificant	In Building 133, the following Electric Oven sources were deleted since
1	Activities	they are tracked elsewhere: IA0016, IA0020, IA0070, and IA0119.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant	In Building 133, the following sources with descriptions were deleted
1	Activities	since they have been removed: IA0100 (Parts Washing), IA0007 and
		IA0116 (Process Tanks), IA0142 and IA0196 (Solvent Cleaning
		Degreasers), IA0198, IE0008, IE0009, and IE0010 (Solvent Cleaning
		Spray Booths), and IE0025 (Solvent Cleaning Glovebox).
Attachment	Insignificant	In Building 133, the following sources with descriptions were deleted
1	Activities	since are no emissions: IB0132 (Process Oil Tank), IA0073 (Process
		Ventilation), IA0155 and IA0156 (Storage Tanks).
Attachment	Insignificant	In Building 133, the following sources with descriptions were deleted they
1	Activities	are tracked elsewhere: IA0204 and IA0205 (Process Ventilation) IB0086 and IC0091 (Storage Tanks).
Attachment	Insignificant	In Building 133, the following Welding Booth sources were deleted since
1	Activities	they have been removed: IA0012, IA0101, IA0102, IA0103, IA0105, IA0106, IA0107, and IA0115.
Attachment	Insignificant	In Building 133, the February 2016 permit modification request that an
1	Activity	existing process tank be included as source ID No. IE0014.
Attachment	Insignificant	In Building 137, the following insignificant activities with descriptions
1	Activities	were calculated and reclassified as significant sources per February 2016
		permit modification: ID0116 (Assembly Testing) and IA0145 (Process
		Tank). Both are now located in Section 1 and Section 2.1 G. and C. The
		updated source ID deleted the "I". New description changes to D0116 is
		(distillate/distillate equivalent fuel-fired turbine engine-APU test cell) and
		A0145 is (Paint stripping tank). D0116 is now subject to 40 CFR Part 63,
		Subpart PPPPP.
Attachment	Insignificant	In Building 137, the February 2016 permit modification request that a new
1	Activity	grinding/sanding booth be installed as source ID No. ID0227. The new
		source is classified as an insignificant activity. ID0227 is controlled by
		new control device CD-ID0227 which is a dry cartridge filter followed in
A 44 = -1 4	T::6:	series by a HEPA filter.
Attachment	Insignificant	In Building 137, the following sources with descriptions were deleted they
1	Activities	were removed: IC0037 (Abrasive Blasting Glovebox), ID0133 (Sanding
		Booth), ID0145 (Parts Washer), ID0179 (Process Stripping Tank), IC0064
		(Process Ventilation Booth), IA0144, IC0063, and ID0035 (Solvent
Attachment	Insignificant	Cleaning Booths).  In Building 137, the following Accessory and Assembly Testing sources
Attachment 1	Activities	were deleted since they have no emissions: IC0007, ID0049, ID0050,
1	ACHVILLES	ID0087, ID0088, ID0153, ID0154, ID0155, ID0156, ID0157, ID0158, and
		ID0087, ID0088, ID0133, ID0134, ID0133, ID0130, ID0137, ID0138, alid ID0212.
Attachment	Insignificant	In Building 137, the following sources with descriptions were deleted
1	Activities	since they have no emissions: ID0119 (Bonding and Curing Autoclave),
•	11011711100	IA0121 (Heat Treatment System), and IC0069 (Metal Working Laser
		Machining).
Attachment	Insignificant	In Building 137, the following sources with descriptions were deleted
1	Activities	since they are tracked elsewhere: IC0080 and IC0129 (Engraving Laser
		Machine), IA0143 (Graphics Processing Tank), ID0144 (Sanding Room),
		IC0043 (Metal Coating Braze Booth), IC0118, ID0002, ID0010, ID0012,
		ID0013, ID0142, and ID0143 (Mixing Booths), ID0139 (Molding Mixing
		Booth), and, ID0098, ID0101, ID0210 (NDI Processes Magnetic
		Inspection).

Page(s)	Section	Description of Change(s)
Attachment	Insignificant	In Building 137, the following NDI Processes sources were deleted since
1	Activities	they were combined with source ID0042: ID0083, ID0084, ID0085, and
		ID0086. Source description for ID0042 was updated from "Ultraviolet
		Inspection Area" to "NDI Line".
Attachment	Insignificant	In Building 137, the following Electric Oven and Furnace sources were
1	Activities	deleted since they have no emissions: IC0016, IC0018, IC0020, IC0023,
		IC0024, IC0025, IC0026, IC0027, IC0029, IC0033, IC0038, IC0039,
		IC0040, IC0090, IC0131, IC0136, IC0137, IC0138, IC0139, IC0140,
		ID0128, ID0166, ID0174, ID0214, and ID0215.
Attachment	Insignificant	In Building 137, the following Electric Oven and Furnace sources were
1	Activities	deleted since they are tracked elsewhere: IC0059, IC0068, IC0073,
A 1	т ' 'С'	ID0014, ID0015, ID0040, ID0074, ID0110, ID0111, ID0118, and ID0198.
Attachment	Insignificant	In Building 137, the Electric Oven and Furnace source IC0032 was deleted
1	Activities	since it was combined with source IC0017.
Attachment	Insignificant	In Building 137, the following sources with descriptions were deleted
1	Activities	since they are tracked elsewhere: ID0017 (Anodizing Tank), IC0132,
		IC0133, IC0134, and ID0209 (Process Tanks), IC0051 and IC0098
		(Process Laboratory Ventilation), IA0191, ID0011, ID0211, and ID0213 (Solvent Cleaning) and IC0108 (Varsol Storage Tank).
Attachment	Insignificant	In Building 137, the following sources with descriptions were deleted
Attachment	Activities	since they have no emissions: ID0180 and ID0181 (Process Ventilation
1	Activities	Pump), and IC0109, IC0110, IC0113, and IC0116 (Storage Tanks).
Attachment	Insignificant	In Building 139, the following Grinding and Sanding Booth sources were
Attachment 1	Activities	deleted since they have been removed: IC0076, IC0077, and IC0078.
Attachment	Insignificant	In Building 154, the following Storage Tank sources were deleted since
1	Activities	they have been removed: IA0182 and IA0183.
Attachment	Insignificant	In Building 154, the following Storage Tank sources were deleted since
1	Activities	they have no emissions: IE0173 and IE0174.
Attachment	Insignificant	In Building 155, the Storage Tank source, IE0175, was deleted since it has
1	Activities	no emissions.
Attachment	Insignificant	In Building 188, the following sources with descriptions were deleted
1	Activities	since they have been removed: ID0201 (NDI Processes), and ID0063 and
		ID0064 (Electric Oven).
Attachment	Insignificant	In Building 245, the Mixing Booth source, ID0104, was deleted since it is
1	Activities	tracked elsewhere.
Attachment	Insignificant	In Building 423, the following Lab Process Hood sources were deleted
1	Activities	since they are tracked elsewhere: ID0202, ID0203, and ID0204.
Attachment	Insignificant	In Building 1006, the following Propane Storage Tank sources were
1	Activities	deleted since they have no emissions: ID0190 and ID0191.
Attachment	Insignificant	In Building 1379, the Propane Storage Tank source, ID0192, was deleted
1	Activities	since it has no emissions.
Attachment	Insignificant	In Building 1380, the Propane Storage Tank sources, ID0193 and ID0194,
1	Activities	were deleted since they have no emissions.
Attachment	Insignificant	In Building 1665, the Process Tank source, IC0135, was deleted since it is
1	Activities	tracked elsewhere.
Attachment	Insignificant	In Building 1694, the Propane Storage Tank source, IE0189, was deleted
1	Activities	since it has no emissions.

Page(s)	Section	Description of Change(s)
NA	NA	In Building 1798, existing source IH0003 was inserted. The direct contact
		propane-fired heater is rated at 0.75 million BTU/hr. The new ID was
		combined with H1000 in the previous permit which has been deleted.
Attachment	Insignificant	In Building 1798, the Mixing Booth source, ID0160, was deleted since it is
1	Activities	tracked elsewhere.
Attachment	Insignificant	In Building 1798, the following Propane Storage Tank sources, were
1	Activities	deleted since they have no emissions: ID0186, ID0187, and ID0188.
Attachment	Insignificant	In Building 3402, the Engine Test Cell source, IA0059, was deleted since
1	Activities	it has been removed.
Attachment	Insignificant	In Building 3402, the February 2016 permit modification request that an
1	Activity	existing direct contact propane-fired heater rated at 6.24 million BTU/hour
		be included as source ID No. IA0075.
Attachment	Insignificant	In Building 3767, the February 2016 permit modification request that a
1	Activity	new abrasive blasting glovebox be installed as source ID No. ID0228. The
		new source is classified as an insignificant activity. ID0228 is controlled
		by new control device CD-ID0228 which is a dry cartridge filter followed
		in series by a HEPA filter.
Attachment	Insignificant	In Building 3767, the Electric Oven source, ID0055, was deleted since it
1	Activities	has no emissions.
Attachment	Insignificant	In Building 3767, the Process Ventilation source, ID0117, was deleted
1	Activities	since it is tracked elsewhere.
Attachment	Insignificant	In Building 3768, the Electric Oven source, ID0067, was deleted since it
1	Activities	has no emissions.
Attachment	Insignificant	In Building 3981, Emergency Generator IC0101 and Storage Tank
1	Activities	IC0112, were deleted since they are air station sources.
Attachment	Insignificant	In Building 4032, existing source IH0004 was inserted. The direct contact
1	Activities	propane-fired heater is rated at 3.3 million BTU/hr. The new ID was not
	T	identified in previous Title V permits.
Attachment	Insignificant	In Building 4032, existing source IH0005 was inserted. The propane-fired
1	Activities	source is rated at 0.15 million BTU/hr and subject to Case by Case MACT
		and MACT DDDDD. The new ID was combined with H1000 in the
Attachment	Insignificant	previous permit which has been deleted.
	Insignificant Activities	In Building 4032, IA0139 description was changed from "Process Tanks"
1 Attachment		to "Chemical Stripping-Paint Stripping Tank".
Attacilileit	Insignificant Activities	In Building 4032, insignificant activity IT0184 (Process Tanks-Zinc nickel plating) was calculated and reclassified as significant sources per February
1	Activities	2016 permit modification. The updated source ID is T0184 with
		description "Zinc nickel plating tank" located in Section 2.1 F. The source
		is controlled by existing scrubber AOH4.
Attachment	Insignificant	In Building 4032, the following sources with descriptions were deleted
1	Activities	since they have no emissions: IA0037 and IA0177 (Lab Process Fog
1	retivities	Chambers), IA0036, IA0193, IA0194, IA0195, IB0053, and IB0054
		(Electric Oven), and IA0152 (Propane Storage Tank).
Attachment	Insignificant	In Building 4032, the following sources with descriptions were deleted
1	Activities	since they are tracked elsewhere: IA0038, IA0039, IA0040, IA0041,
-	- 1001/1000	IA0042, IA0043, IA0044, IA0045, IA0046, IA0047, IA0048, and IA0176
		(Lab Process Hoods and Equipment), IA0080 and IA0192 (NDI Processes)
		and IA0126 (Process Conversion Tank).
	1	

Page(s)	Section	Description of Change(s)
Attachment	Insignificant	In Building 4032, the following sources with descriptions were deleted
1	Activities	since they have been removed: IB0057 (Parts Washer) and IA0181
		(Storage Tank).
Attachment	Insignificant	Source IC0120 (Paint Spray Gun Cleaning) was in Building 4032 but the
1	Activities	source was moved to Building 245.
Attachment	Insignificant	In Building 4034, the following sources with descriptions were deleted
1	Activities	since they are tracked elsewhere: ID0004 (Leak Testing Repair) and
		ID0003 and ID0005 (Electric Oven).
Attachment	Insignificant	In Building 4035, the following sources with descriptions were deleted
1	Activities	since they have been removed: IP0002 (Electric Oven), IT0109, IT0114,
		and IT0118 (Process Tanks).
Attachment	Insignificant	In Building 4035, the Leak Testing Repair source, IP003, was deleted
1	Activities	since it is tracked elsewhere.
Attachment	Insignificant	In Building 4035, the following Storage Tanks sources were deleted since
1	Activities	they have no emissions: IP0006, IP0007, IP0008, and IP0009.
Attachment	Insignificant	In Building 4037, the Electric Oven source, ID0207, was deleted since it
A tto alamant	Activities	has no emissions.
Attachment 1	Insignificant Activities	In Building 4037, the following sources with descriptions were deleted
1	Activities	since they have been removed: ID0208 (Oven) and ID0206 (Storage Tank).
Attachment	Insignificant	In Building 4172, the Storage Tank source, IA0150, was deleted since it
1	Activities	has been removed.
Attachment	Insignificant	In Building 4173, the following sources with descriptions were deleted
1	Activities	since they have no emissions: IB0129 (Electric Oven), IB0020, IB0023,
1	renvines	and IB0024 (Process Ventilation), and IA0151 (Propane Storage Tank).
Attachment	Insignificant	In Building 4173, the Parts Washer source, IA0081, was deleted since it
1	Activities	has been removed.
Attachment	Insignificant	In Building 4187, the NDI Processes source, ID0216, was deleted since it
1	Activities	is tracked elsewhere.
Attachment	Insignificant	In Building 4188, the Storage Tank sources, IA0154 and IA0180, were
1	Activities	deleted since they have no emissions.
Attachment	Insignificant	In Building 4224, the following sources with descriptions were deleted
1	Activities	since they have no emissions: IB0122 and IB0136 (Bonding and Curing),
		IA0034, IB0089, IB0099, IB0102, IB0125, IB0126, IB0127, and IB0135
		(Electric Ovens), and IC0122 and IC0123 (Process Ventilation).
Attachment	Insignificant	In Building 4224, the following sources with descriptions were deleted
1	Activities	since they are tracked elsewhere: IB0058 and IB0098 (Mixing Booths),
		IB0051, IB0061, IB0062, and ID0001 (Electric Oven), IB0128 (Process
	× 1 10	Tank), and IA0129 (Solvent Cleaning).
Attachment	Insignificant	Source IB0085 (Storage Tank) was in Building 4224 but the source was
1	Activities	moved to Building 133.
Attachment	Insignificant	In Building 4225, IE0073 description was changed from "Battery
1	Activities	Maintenance" to "Pump (backup water)". The source is applicable to MACT ZZZZ conditions.
Attachmant	Incignificant	In Building 4225, the Metal Coating Ivadizer source, IA0123, was deleted
Attachment	Insignificant Activities	since it has been removed.
Attachment	Insignificant	In Building 4225, the following sources with descriptions were deleted
Attachment 1	Activities	since they are tracked elsewhere: IE0159 (Mixing Booth), and IE0177
1	7100111000	(NDI Processes).
	1	(112111000000).

Page(s)	Section	Description of Change(s)
Attachment	Insignificant	In Building 4225, the following sources with descriptions were deleted
1	Activities	since they have no emissions: IB0093, IE0074, IE0075, IE0076, IE0077,
		IE0164, IE0180, and IE0181 (Electric Ovens and Furnaces), and IE0176
		(Propane Storage Tank).
Attachment	Insignificant	In Building 4225, the Hydrogen Diffusion Furnace sources, IE0092 and
1	Activities	IE0171, were deleted since they have no regulated pollutants.
Attachment	Insignificant	In Buildings 4466, 4470, 4497, 4498, 4528, and 4533, the following
1	Activities	Storage Tank sources were deleted since they have no emissions: ID0195, IA0159, IA0160, IB0119, IB0120, IA0184, IA0185, IA0187, IA0188, IA0189, and IB0143.
Attachment	Insignificant	In Buildings 4528, 4561, and V22, the following sources with descriptions
1	Activities	were deleted since they are tracked elsewhere: IA0186 (Storage Tank), IA0127 (Solvent Cleaning), ID0217 Bonding Room, ID0220 (Electric Oven), and ID0219 (Process Ventilation).
Attachment	Insignificant	Source ID0218 (Sanding Booth) in the previous permit was located in
1	Activities	building V22 but the actual building number is revised to Building 4808.
Attachment	Insignificant	Inserted * for Case by Case MACT and MACT DDDDD date information.
1	Activities List	
Attachment	Insignificant	Inserted DEQ web link information in Item No. 3 at bottom of attachment
1	Activities List	as general information.
2	Table of	Per request from the facility and to help eliminate redundancy, the sources
	Contents	have been grouped by similar type sources instead of by building numbers
		in Section 2.1. Therefore, the buildings with page numbers were deleted.
		Several areas of Section 2.2 were also eliminated.
3	Section 1	Included column for page numbers.
3	Section 1	Added superscript "EAF (Existing Affected Source)" to the control device
		description for sources D0097 and D0184. Added superscript "NAF"
		(New Affected Source) to the control device description for sources A0178,
		D0053, D0182, D0183, D0205, D0221, and E0080. At the end of Section,
		both the EAF and NAF definitions are changed from "primer and topcoat
		application operations applicability" to "primer and topcoat application,
		and depainting operations applicability".
3-7 and 8-	Sections 1	Per request from the facility and to help eliminate redundancy, the updated
43	and 2.1.	permitted sources have been grouped by similar type sources instead of
		building numbers. In Section 1, the rows with the building numbers were
		deleted and a column with the building numbers was inserted. Section 2.1
		is now organized from 2.1 AH.
3, 9	Sections 1	In Building 84, the previous permit source D0069 (paint booth) was in
	and	Section 2.1. 84.B. and now is grouped in Section 2.1 A.
2.0	2.1.84.B.	T D 11: 04 d
3, 8	Sections 1	In Building 84, the previous permit source D0127 (wood working
	and 2.1.84.A.	operation) was in Section 2.1. 84.A. and now is grouped in Section 2.1 H.
3, 9, 51	Sections 1,	In Building 129, the previous permit sources D0061 and D0066 (paint
	2.1.129.A.,	booths) were in Section 2.1. 129.A. and now are grouped in Section 2.1 A.
	and	D0061 minimum pressure drop for the filter system was updated from 0.30
	2.2.A.2.g.ii.	to 0.25.
3, 15	Sections 1	In Building 133, the Accessory Test Stand sources, E0041 and E0064,
	and 2.1 133.E.	were deleted since they have no emissions.

Page(s)	Section	Description of Change(s)
3, 15, 80	Sections 1,	In Building 133, the following significant sources with descriptions were
	2.1 133.D.	calculated and reclassified as insignificant activities per February 2016
	and F., and	permit modification: A0130 (NDI Processes), and B0078, B0079, B0080,
	2.2 C.	and E0019 (Open Top Tanks). The updated source ID starts with "I" and
		regulation 15A NCAC 02D .0958 in 2.2 C. is no longer applicable.
3, 9, 51	Sections 1,	In Building 133, the previous permit sources A0019 and A0032 (paint
	and	booths) were in Section 2.1.133.A. and now are grouped in Section 2.1 A.
	2.1.133.A	
3, 13	Sections 1	In Building 133, the facility request flexibility with source E0080 which
	and	would now be subject to 40 CFR 63, Subpart GG. The source description
	2.1 133.C.	was changed from "abrasive blasting walk-in booth" to "abrasive blasting
		operation". In the previous permit, the source was located Section
		2.1.133.C and now is grouped in Section 2.1 B. The previous permit
		pressure drop was TBD. In Section 2.1 B.1.d., the updated pressure drop
		range for the cartridge is 1.0-7.0 and for the HEPA filter is 0.9-2.25.
3, 11	Sections 1,	In Building 133, the previous permit high velocity oxygenated fuel
	and	(HVOF) thermal spray booth sources A0009, A0010, and A0011 were in
	2.1.133.B.	Section 2.1.133.B. and now are grouped in Section 2.1 D. The previous
		permitted sources A009, A0010, and A0011 shared a HEPA filter. The
		updated permitted shared HEPA filter now has a new Source ID
		(CD-A0012) which is included in Section 1, Section 2.1 D. and
2 ( 20 20	C4' 1	2.2 B.2.j., k., and p.
3-6, 20, 28,	Sections 1,	In Buildings 133, 137, 3402, and 4188, the previous permit engine test
37	2.1 133.E.,	cells/stands A0001, A0002, A0003, A0004, D0147, D0148, D0149,
	2.1 137.D.,	D0150, D0151, D0152, A0077 and A0058 were in Sections 2.1 133.E., 2.1 137.D., 2.1 3402.A., and 2.1 4188.A. and now are grouped
	3402,A., and 2.1 4188.A.	in Section 2.1 G. The sources are now subject to 40 CFR Part 63, Subpart
	2.1 4100.A.	PPPPP "MACT Standards for Engine Test Cells/Stands" and the updated
		appropriate rule was inserted in Sections 1 and 2.1 G. ID description for
		all sources is updated to "distillate fuel/distillate equivalent fuel-fired
		turbine engine-APU test cell". For A0077, deleted Section 1 description
		"T047".
3, 16, 22,	Sections 1,	In Building 137, the following significant sources with descriptions were
61, 80	2.1 137.A and	
,	H., and 2.2 C.	permit modification: C0004 (Solvent Cleaning), and C0036 (Open Top
	ŕ	Tank). The updated source ID starts with "I" and regulation 15A NCAC
		02D .0958 in 2.2 C. is no longer applicable.
4, 22, 88	Section 1,	In Building 137, D0113 and D0114 are now classified as insignificant
	2.1 137.I,	activities with the new identifications being ID0113 and ID0114. The
	and 2.2 D.	sources are subject to Case by Case MACT and MACT DDDDD. The
		units are propane-fired and rated at 5.99 million BTU/hr each. Per
		February 2016 permit modification, source ID0113 will be replaced with
		essentially an identical piece of equipment.
5, 27, 81	Section 1,	In Building 137, C0017 is now classified as an insignificant activity with
	2.1 137.I,	the new identifications being IC0017. The source is subject to Case by
	and 2.2 D.	Case MACT and MACT DDDDD, the unit is propane-fired and rated at
		0.2 million BTU/hr. Per February 2016 permit modification, the source
		will be replaced with essentially an identical piece of equipment.

Page(s)	Section	Description of Change(s)
4, 16, 49	Sections 1,	In Buildings 137, paint booth D0033 with associated control device CD-
	2.1.137.B.,	D0033 were deleted since they have been removed from the facility.
	and	
	2.2.A.2.g.ii.	
4, 16, 49	Sections 1,	In Building 137, the previous permit paint booth sources C0005, C0056,
	2.1.137.B.,	C0062, D0008, D0009, D0036, and D0131 were located Section 2.1.
	and	137.B. and now are grouped in Section 2.1 A. C0056 pressure drop range
	2.2.A.2.g.ii.	for the filter system was updated from 0.1-2.0 to 0.10-0.75. D0036 AND
		D0131 maximum pressure drops for the filter systems were updated from
4.21	0 2 1	3.0 to 0.30.
4, 21	Sections 1	In Building 137, the previous permit source D0120 (Depainting/chemical
	and	stripping area) was in Section 2.1. 137.E. and now is grouped in Section
4 21	2.1.137.E.	2.1 C.
4, 21	Sections 1	In Building 137, D0097 source description was changed from "abrasive
	and 2.1 137.G.	blast room" to "abrasive blasting operation." In the previous permit, the source was located Section 2.1.137.G and now is grouped in Section 2.1 B.
	2.1 137.G.	source was located Section 2.1.137.9 and now is grouped in Section 2.1 B.
3-4, 15-17,	Sections 1,	In Building 137, the following sources with descriptions were deleted
72	2.1 137.A.	since they have been removed: C0003, D0025, D0026, and D0027
	and C, 2.2 A.	(Solvent Spray Booth), D0016, and D0177 (Chromic Acid Anodizing
	and B.	Tank).
4, 16, 49	Sections 1,	In Building 245, the previous permit paint booth sources D0106, D0129,
	and	and D0226 were located in Section 2.1.245.A. and now are grouped in
	2.1 245.B.	Section 2.1 A. Sources D0106 and D0129 description was changed from
		"paint booth hanger" to "paint booth". The description for CD-0129 was
		changed from "with eight three stage" to "with three cross flow stage".
50	Section	In Building 245, the previous permit control device CD-D0129 had stack
	2.2 A.2.g.ii.	numbers 181 through 188. The updated stack numbers changed from 181
		to A and from 182 to B. Stacks 183 through 188 were eliminated since the
5.04	G .: 1	stacks pressure drops are monitored only through stacks A and B.
5, 24	Sections 1,	In Building 423, the previous permit had source D0221 (laser depainting
	2.1 423.A.	system) in Section 2.1.423.A. and now is updated and grouped in Section 2.1 B. For flexibility, the facility requested the source also be included in
		Section 2.1 C. which is subject to MACT GG "Chemical Depainting
		Operations".
7, 43, 81	Sections 1,	H1000 with source description as "Miscellaneous Boilers and Process
,, 13, 01	2.1 MISC.A.	Heaters" has been removed from the permit. To improve the facility's
	and 2.2 D	ability to Comply with MACT DDDDD, H1000 has been modified to
		individually identify each unit as insignificant activities IH0003 (direct
		heat) and IH0005 (MACT DDDDD).
5, 25, 49-50	Sections 1,	In Building 1798, the previous permit paint booth source D0052, was in
	2.1.1798.A.,	Section 2.1. 1798.A. and now is grouped in Section 2.1 A. D0052
	and	pressure drop range for the filter system was updated from 0.18-1.6 to
	2.2.A.2.g.ii.	0.05-1.60.

Page(s)	Section	Description of Change(s)
5, 26	Sections 1	In Building 1798, the facility request flexibility with source D0053 which
	and	would now be subject to 40 CFR 63, Subpart GG. The source description
	2.1 1798.C.	was changed from "abrasive blasting walk-in booth" to "abrasive blasting
		operation". In the previous permit, the source was located Section
		2.1.1798.C. and now is grouped in Section 2.1 B. The previous permit
		pressure drop was TBD. In this permit, CD-D0053 is included in Section
		2.1 B.1.d. where the updated pressure drop range for the cartridge is 1.0-
		6.50 and for the HEPA filter is 0.7-2.5.
5, 27, 81	Section 1,	In Building 1798, H0001 and H0002 are now classified as insignificant
	2.1 137.I,	activities with the new identifications being IH0001 and IH0002. The
	and 2.2 D.	direct contact, propane-fired units are rated at 5.99 million BTU/hr each.
5, 6, 25, 31,	Sections 1,	In Buildings 1798, 4032, and 4035, the following significant sources with
33, 36, 80	2.1 1798.B,	descriptions were calculated and reclassified as insignificant activities per
	2.1 4032.B.,	February 2016 permit modification: D0054 (Solvent Cleaning), A0138
	2.1 4035.A.	(NDI Processes), and T0087, T0191, T0195, T0201, and T0211 (Open
	and C., and	Top Process Tanks). The updated source ID starts with "I" and regulation
	2.2 C.	15A NCAC 02D .0958 in 2.2 C. is no longer applicable.
5, 28	Sections 1,	In Building 3766, D0184 source description deletion of "corrosion hanger"
	and	was made. In the previous permit, the source was located Section
	2.1 3766.A.	2.1.3766.G and now is grouped in Section 2.1 B.
5, 6, 29, 30,	Sections 1,	In Buildings 3767, 4032, and 4224, the previous permit paint booth
39	2.1.3767.A	sources D0056, A0179, B0101, were in Sections 2.1. 3767.A.,
	2.1.4032.A.,	2.1.4032.A., and 2.1.4224.B. but now are grouped in Section 2.1 A.
	and	
5 20 50	2.1.4224.B.	T D '11' 4022 ' 41 4 D0007 '41 ' 4 1 4 1 1 '
5, 30, 50	Sections 1,	In Buildings 4032, paint booth D0007 with associated control device
	2.1.4032.A.,	CD-D0007 were deleted since they have been removed from the facility.
	and	
5, 6, 31, 59	2.2.A.2.g.ii. Sections 1	In Building 4034, D0182 source description was changed from "plastic
3, 0, 31, 39	and	media blast (PMB) hanger" to "abrasive blasting operation". In the
	2.1.4034.A.	previous permit, sources D0182, D0183 and D0205 were located Section
	2.1.4034.A.	2.1.4034.A. and now are grouped in Section 2.1 B.
6, 33, 73	Sections 1,	In Building 4035, the previous permit chrome plating tank sources T0099,
0, 55, 75	2.1.4035.B.,	T0100. T0105, T0106, T0155, and T0218, were in Sections 2.1.4035.B.
	and 2.2.B	but now are in Section 2.1.E. Since source is soluble and well below the
	una 2.2.B	TPER, the toxic section in 2.2 B. is no longer applicable.
6, 33, 73	Sections 1,	In Building 4035, the previous permit tank sources T0074. T0127, T0131,
0,00,70	2.1.4035.B.,	and T0188 were in Sections 2.1.4035.A. but now are in Section 2.1.F. The
	and 2.2.B.2.	dashes were removed from associated control devices A-OH-2, A-OH-3,
		and A-OH-4. The facility requested flexibility and added existing
		scrubbers AOH1, CR1, and OH1 to toxic Section 2.2.B.2.d.and 2.2.B.2.f.
		In Section 2.2.B.2.f., the new pressure drop ranges are for the following
		scrubbers: AOH1 (0.4-2.0), CR1 (0.4-2.7), and OH1 (0.75-3.0).
6, 37, 80	Sections 1,	In Building 4037, significant source D0199 (adhesive coating booth)
, ,	2.1 4037.A.,	recalculated and reclassified as an insignificant activity per July 10, 2017
	and 2.2 C.	Addendum 1 of the permit renewal. The updated source ID starts with "I"
		and regulation 15A NCAC 02D .0958 in 2.2 C. is no longer applicable.

Page(s)	Section	Description of Change(s)
5, 6, 25, 31,	Sections 1,	In Buildings 4188, 4224, and 4225, the following significant sources with
33, 36, 80	2.1 1798.B,	descriptions were calculated and reclassified as insignificant activities per
	2.1 4032.B.,	February 2016 permit modification: A0076 (Storage Tank), B0063
	2.1 4035.A.	(Bonding and Curing Autoclave), E0083 (NDI Processes), and E0141
	and C., and	(Solvent Cleaning). The updated source ID starts with "I" and regulation
	Section 2.2 C.	15A NCAC 02D .0958 in 2.2 C. is no longer applicable.
6, 40, 50	Sections 1,	In Building 4225, the previous permit paint booth source E0160, was in
	2.1.4225.B.,	Section 2.1. 4225.B. and now is grouped in Section 2.1 A. E0160
	and	minimum pressure drop range for the filter system was updated from 0.20
	2.2.A.2.g.ii.	to 0.1.
3, 11	Sections 1	In Building 4225, the previous permit high velocity oxygenated fuel
	and	(HVOF) thermal spray booth source E0165 was in Section 2.1.4225.E. and
	2.1.4225.E.	now is grouped in Section 2.1 D. Per February 2016 permit modification
		and April 25, 2016 502(b)10 request, E0165 will be replaced with
		essentially an identical piece of equipment and the most recent control
		device is included in Section 2.2 B.2. The previous pressure drop range
		for CD-E0165 was 1.0-6.0 for the combined system and now is updated to
		0.35-6.0 for the cartridge filter and 1.0-6.0 for the HEPA filter. In the
		source description, the word "metal" was deleted.
3, 11, 70	Sections 1,	In Building 4225, the June 2016 permit modification request that previous
	2.1 D.,	insignificant activity HVOF source IE0089 to be replaced and updated to a
	2.2.B.2., and	significant source and named E0089. E0089 includes a new dry cartridge
	Insignificant	filter with HEPA filter CD-E0089 and the sources are now in Sections 2.1
	Activities	D. and Section 2.2 B.2. (pressure drop range TBD). Per February 2016
		permit modification and updated information from the December 20, 2016
		email, a new HVOF thermal spray booth E0207 with a surface
		pretreatment process will be installed. The booth control device will be a
		wet scrubber (CD-E0207A) and the pretreatment process control device
		will be a high efficiency cyclone (CD-E0207B). E0207 and the control
		devices are in Sections 2.1 D. and Section 2.2 B.2. (pressure drop ranges TBD).
11	Section 2.1 A.	In updated Section 2.1 A.1.a., the visible emission language changed from
11	Section 2.1 A.	"Visible emissions from paint spray booths shall" to "Visible emissions
		from all paint booths except for (ID No. C0056) shall".
14	Sections	In updated Sections 2.1 C.2.a. and 2.1 G.1.a, added "[15A NCAC 02D]
17	2.1 D.2.a. and	.0516]" to the end of the referenced regulation.
	2.1 G.1.a	
65	Section	Deleted the table since it is already located in Section 2.1 B.1.d.
	2.2 A 3.c.ii.	2 cities the more times it is already found in section 2.1 B.1.d.
67	Section	The previous Section of 2.2 B. (Toxic Air Pollutant Emission Sources) has
	2.2 B.1.	been reorganized based on a February 2016 facility permit application for
		an air toxic modeling demonstration approved by the Division of Air
		Quality per memo dated March 21, 2016. A facility letter dated June 20,
		2016 was also submitted requesting removal of applicable toxic rates.
		Updated Section 2.2 B.1. includes limitations for non-specific chromium
		(VI) compounds for non-MACT/NESHAP sources by source limits. All
		other previous source by source TAPs were well below the AAL and were
		deleted.

Page(s)	Section	Description of Change(s)		
68	Section 2.2 B.2.a.	Per approved March 21, 2016 modeling demonstration, updated Section 2.2 B.2.a. includes facility wide TAPs emission limitations above 50%		
		AAL. The TAPs listed are maleic anhydride and non-specific chromium (VI) compounds including all MACT/NESHAP sources. All other		
		previous facility wide TAPs are well below the AAL and deleted.		
68	Section 2.2 B.2.bp.	Per approved March 21, 2016 modeling demonstration, updated Section 2.2 B.2bp. includes facility wide 15A NCAC 02D .1104 TAPs AAL limitations for nickel metal and nickel, soluble compounds, as nickel. T		
		reporting requirements included updated pressure drop ranges for the scrubbers, cartridge filters, and HEPA filters. Per permit modification, CD-E0089 and CD-E0207 were added to this section.		
80	Section 2.2 C.	In the previous permit, there were requirements for 15A NCAC 02D .0958: Work Practices for Sources of Volatile Organic Compounds in Section 2.2 C. Per applicability of 15A NCAC 02D .0902 (e) and (f) as amended November 1, 2016, the facility's regulatory requirement for 15A NCAC 02D .0958 no longer applies to Craven County.		
81	Section 2.2 D.	In the previous permit, there were requirements for several small boilers and heaters in Section 2.2 D. As noted above, the sources were reclassified as insignificant activities and the section was deleted.		
10-20	General Conditions	Updated to latest version of DAQ shell version 5.1 08/03/2017.		



### State of North Carolina Department of Environmental Quality Division of Air Quality

### AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
05506T44	05506T43	November ##, 2017	October 31, 2022

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

#### **Permittee: Fleet Readiness Center East**

2500159 **Facility ID:** 

**Facility Site Location: A Street – Marine Corps Air Station** 

City, County, State, Zip: Cherry Point, Craven County, NC, 28533-0021

**Mailing Address: PSC Box 8021** 

City, State, Zip: Cherry Point, Craven County, NC, 28533-0021

**Application Number:** 2500159.16A, .16B, .16C. .16D

**Complete Application Date:** 04/25/2016 07/12/2016 01/28/2016 02/12/2016

**Primary SIC Code:** 9711

Division of Air Quality, **Washington Regional Office Regional Office Address:** 943 Washington Square Mall

Washington, NC 27889

Permit issued this the ##<sup>th</sup> day of November, 2017

William D. Willets, P. E., Chief, Permitting Section By Authority of the Environmental Management Commission

### Table of Contents

SECTION 1:		TED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CON' (S) AND APPURTENANCES	TROL
SECTION 2:		C LIMITATIONS AND CONDITIONS	
2.1 -		Source(s) Specific Limitations and Conditions	
	(Including requireme	g specific requirements, testing, monitoring, recordkeeping, and reporting ents)	
2.2-	Multiple	Emission Source(s) Specific Limitations and Conditions (Including specific	
	requireme	ents, testing, monitoring, recordkeeping, and reporting requirements)	
	2.2 A.1	Facility Wide Emission Standards For Aerospace Manufacturing And	44
		Rework Facilities - Cleaning Operations	
	2.2 A.2	Facility Wide Emission Standards For Aerospace Manufacturing And	47
		Rework Facilities - Primer and Topcoat Application Operations	
	2.2 A.3	Facility Wide Emission Standards For Aerospace Manufacturing And	52
		Rework Facilities - Non-Chemical Depainting Operations	
	2.2 A.4	Facility Wide Emission Standards For Aerospace Manufacturing And	56
		Rework Facilities - Chemical Depainting Operations	
	2.2 A.5	Facility Wide Emission Standards For Aerospace Manufacturing And	57
		Rework Facilities - Chemical Milling Maskant Application Operations	
	2.2 A.6	Facility Wide Emission Standards For Aerospace Manufacturing And	58
		Rework Facilities - Handling And Storage Of Waste	
	2.2 B.1.	Toxic Air Pollutant Emission Sources – Source Specific Emissions	59
	2.2 B.2.	Toxic Air Pollutant Emission Sources - Facility Wide Modeled Toxic Air Pollutants	58

#### SECTION 3: GENERAL PERMIT CONDITIONS

#### ATTACHMENTS

ATTACHMENT 1 .....List of Acronyms

# SECTION 1- PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Building No.	Control Device Description	Ref.
	D0069 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0069	84	dry particulate filter system EAF	A.
	D0061 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0061	129	dry particulate filter system	A.
	D0066 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0066	129	dry particulate filter system EAF	A.
	A0019 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-A0019	133	dry particulate filter system	A.
	A0032 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-A0032	133	dry particulate filter system	A.
	A0178 MACT, Subpart GG	Sermetal spray booth and associated spray gun cleaning operation	CD-A0178	133	dry particulate filter system venting to activated carbon filter NAF	A.
	C0005 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-C0005	137	dry particulate filter system EAF	A.
	C0056 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-C0056	137	dry particulate filter system EAF	A.
	C0062 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-C0062	137	dry particulate filter system EAF	A.
	D0008 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0008	137	dry particulate filter system EAF	A.
	D0009 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0009	137	dry particulate filter system EAF	A.
	D0036 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0036	137	dry particulate filter system EAF	A.
	D0131 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0131	137	dry particulate filter system <sup>EAF</sup>	A.
	D0106 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0106	245	dry particulate filter system with 16 filter banks <sup>EAF</sup>	A.
	D0129 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0129	245	dry particulate filter system with three cross flow stage filter banks <sup>IAF</sup>	A.

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Building No.	Control Device Description	Ref.
	D0226 <sup>24</sup> MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0226A CD- D0226B**	245	3-stage paint overspray filtration system and carbon adsorption capture system NAF	A.
	D0052 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0052	1798	dry particulate filter system with six filter banks <sup>EAF</sup>	A.
	D0056 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-D0056	3767	dry particulate filter system	A.
	A0179 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-A0179	4032	dry particulate filter system	A.
	B0101 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-B0101	4224	dry particulate filter system	A.
	E0160 MACT, Subpart GG	paint booth and associated spray gun cleaning operation	CD-E0160	4225	dry particulate filter system	A.
	E0080 MACT, Subpart GG	abrasive blasting operation	CD-E0080	133	cartridge filter venting to HEPA filter NAF	B.
	D0097 MACT, Subpart GG	abrasive blasting operation	CD-D0097	137	cartridge filter EAF	B.
	D0221 MACT, Subpart GG	laser depainting system	CD-D0221	423	dry particulate cartridge filter system (80 square feet of surface area) with add-on HEPA filter system (66 square feet of surface area) NAF	B. and C.
	D0053 MACT, Subpart GG	abrasive blasting operation	CD-D0053	1798	cartridge filter (15,024 square feet of surface area and HEPA filter with 1,252 square feet of surface area)	В.
	D0184 MACT, Subpart GG	abrasive blasting operation	CD-D0184	3766	filter system with three cartridge filter banks (7,500 square feet of filter surface area each) EAF	В.
	D0182 MACT, Subpart GG	abrasive blasting operation with three two- stage filter systems	CD-D0182A CD-D0182B	4034	cartridge filter venting to HEPA filter NAF	B.
			CD-D0182C CD-D0182D		cartridge filter venting to HEPA filter NAF	
			CD-D0182E CD-D0182F	face	cartridge filter venting to HEPA filter NAF	47
	D0183	media recovery unit 1 of 2	Total filter surface area of each couplet is 27,778 so			B.
	MACT, Subpart GG	media recovery unit 1 of 2	CD-D0183A CD-D0183B	4034	cartridge filter venting to HEPA filter NAF	Б.
	D0205	modio mogovario i 2 · C2			couplet is 5,040 square feet]	D
	D0205 MACT, Subpart GG	media recovery unit 2 of 2	CD-D0205A CD-D0205B	4034	cartridge filter venting to HEPA filter NAF  couplet is 2,520 square feet	В.

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Building No.	Control Device Description	Ref.
	A0145 MACT, Subpart GG	Paint striping tank	None	137	None	C.
	D0120 MACT, Subpart GG	depainting/chemical stripping area (strip hangar)	None	137	None	C.
	A0009	high velocity oxygenated fuel thermal spray (HVOF) booth	CD-A0009 CD-A0012	133	cartridge filter venting to shared HEPA filter	D.
	A0010	high velocity oxygenated fuel (HVOF) thermal spray booth	CD-A0010 CD-A0012	133	cartridge filter venting to shared HEPA filter	D.
	A0011	high velocity oxygenated fuel (HVOF) thermal spray booth	CD-A0010 CD-A0012	133	cartridge filter venting to shared HEPA filter	D.
	E0089	high velocity oxygenated fuel (HVOF) thermal spray booth	CD-E0089	4225	cartridge/HEPA filter system	D.
	E0165	high velocity oxygenated fuel (HVOF) thermal spray booth	CD-E0165	4225	cartridge/HEPA filter system	D.
	E0207	high velocity oxygenated fuel thermal spray booth with surface pretreatment process	CD-E0207A CD-E0207B	4225 4225	venturi air scrubber splitstream counter cyclonic dust collector	D.
	T0099 MACT, Subpart N	hard chrome plating tank	CR2R	4035	four stage composite mesh pad scrubber	Е
	T0100 MACT, Subpart N	hard chrome plating tank	CR2R	4035	four stage composite mesh pad scrubber	Е
	T0105 MACT, Subpart N	hard chrome plating tank	CR2R	4035	four stage composite mesh pad scrubber	Е
	T0106 MACT, Subpart N	hard chrome plating tank	CR2R	4035	four stage composite mesh pad scrubber	Е
	T0155 MACT, Subpart N	hard chrome plating tank	CR2R	4035	four stage composite mesh pad scrubber	Е
	T0218 MACT, Subpart N	hard chrome plating tank	CR2R	4035	pad scrubber	Е
	T0074	nickel strike tank	AOH2	4035	vertical packed-bed tower scrubber	F
	T0127	plating tank	АОН3	4035	vertical packed-bed tower scrubber	F.
	T0131	plating tank	АОН3	4035	vertical packed-bed tower scrubber	F.
	T0184	Zinc nickel plating tank	AOH4	4035	vertical packed-bed tower scrubber	F.
	T0188	nickel strike tank	AOH4	4035	vertical packed-bed tower scrubber	F.
	A0001 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	133	None	G.
	A0002 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	133	None	G.

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Building No.	Control Device Description	Ref.
	A0003 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	133	None	G.
	A0004 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	133	None	G.
	D0116 MACT, Subpart PPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	137	None	G.
	D0147 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	137	None	G.
	D0148 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	137	None	G.
	D0149 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	137	None	G.
	D0150 MACT, Subpart PPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	137	None	G.
	D0151 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	137	None	G.
	D0152 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	137	None	G.
	A0077 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell	None	3402	None	G.
	A0058 MACT, Subpart PPPPP	distillate/distillate equivalent fuel-fired turbine engine-APU test cell F402	None	4188	None	G.
	D0127	wood working operation and dust collection system	CD-D0127	84	simple cyclone (104 inches in diameter)	H.
	B0040 MACT, Subpart GG	Solvent cleaning spray booth	None	133	None	I.
	E0088	hydrogen fluoride cleaning electric furnace	CD-E0088A CD-E0088B CD-E0088C CD-E0088D	4225	Four venturi/packed tower scrubbers using water/sodium hydroxide scrubbing solution in parallel	**

Permit No. 05506T44 Page 8

- EAF Existing affected facility for primer and topcoat application, and depainting operations applicability, standards, and control requirements.
- IAF Interim affected facility for primer and topcoat application operations applicability, standards, and control requirements.
- NAF New affected facility for primer and topcoat application and depainting operations operations applicability, standards, and control requirements.
- -----Ref = Item location in Section 2.1 Specific Limitations and Conditions

\*The carbon adsorption capture system (ID No. CD-D0226B) installed on paint booth (ID No. D0226) will not be utilized for 40 CFR 63 Subpart GG compliance. However, if the carbon adsorption capture system (ID No. CD-D0226B) is utilized for compliance with 40 CFR 63.745(d), then the owner or operator shall conduct an initial performance test pursuant to 40 CFR 63.749(d) to demonstrate compliance with the overall reduction efficiency according the procedures of 40 CFR 63.750(g) unless a waiver is obtained under 40 CFR 63.7(e)(2)(iv) or 63.7(h) is obtained.

\*\*The hydrogen cleaning electric furnace (I.D. No. E0088) is listed in Section 1 of this permit as an emission source. However, there are no applicable regulations since a facility modeling demonstration approved by DAQ per memo on March 21, 2016 provided insignificant fluoride emissions.

#### SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

### 2.1- Emission Source(s) and Control Devices(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

- A. Building 84: Paint booth (ID No. D0069) with dry particulate filter system (ID No. CD-D0069) and associated spray gun cleaning operation
  - Building 129: Paint booth (ID No. D0061) with dry particulate filter system (ID No. CD-D0061) and associated spray gun cleaning operation

    Paint booth (ID No. D0066) with dry particulate filter system (ID No. CD-D0066) and associated spray gun cleaning operation
  - Building 133: Paint booth (ID No. A0019) with dry particulate filter system (ID No. CD-A0019) and Paint booth (ID No. A0032) with dry particulate filter system (ID No. CD-A0032) and associated spray gun cleaning operation, both with shared electric drying oven Sermetal spray booth (ID No. A0178) and associated spray gun cleaning operation with dry particulate filter system venting to activated carbon filter (ID No. CD-A0178)
  - Building 137: Paint booth (ID No. C0005) with dry particulate filter system (ID No. CD-C0005)
    Paint booth (ID No. C0056) with dry particulate filter system (ID No. CD-C0056)
    Paint booth (ID No. C0062) with dry particulate filter system (ID No. CD-C0062)
    Paint booth (ID No. D0008) with dry particulate filter system (ID No. CD-D0008)
    Paint booth (ID No. D0009) with dry particulate filter system (ID No. CD-D0009)
    Paint booth (ID No. D0036) with dry particulate filter system (ID No. CD-D0036)
    Paint booth (ID No. D0131) with dry particulate filter system (ID No. CD-D0131), and each booth having an associated spray gun cleaning operation
  - Building 245: Paint booth (ID No. D0106) with dry particulate filter system (16 filter banks; ID No. CD-D0106) and associated spray gun cleaning operation

    Paint booth (ID No. D0129) with dry particulate filter system (three stage cross flow filter banks; ID No. CD-D0129) and associated spray gun cleaning operation

    Paint booth (ID No. D0226) with 3-stage paint overspray filtration system (ID No. CD-D0226A) and carbon adsorption capture system (ID No. CD-D0226B)\*
  - Building 1798: Paint booth (ID No. D0052) with dry particulate filter system (6 filter banks; ID No. CD-D0052) and associated spray gun cleaning operation
  - Building 3767: Paint booth (ID No. D0056) with dry particulate filter system (ID No. CD-D0056) and associated spray gun cleaning operation
  - Building 4032: Paint booth (ID No. A0179) with dry particulate filter system (ID No. CD-A0179) and associated spray gun cleaning operation
  - Building 4224: Paint booth (ID No. B0101) with dry particulate filter system (ID No. CD-B0101) and associated spray gun cleaning operation
  - Building 4225: Paint booth (ID No. E0160) with dry particulate filter system (ID No. CD-E0160) and associated spray gun cleaning operation  $\frac{1}{2}$

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Visible emissions	20 percent opacity for all sources listed above except ID No. C0056 and D0106	15A NCAC 02D .0521
Visible emissions	40 percent opacity for ID No. C0056 and D0106	15A NCAC 02D .0521
HAP and VOC	MACT Standards for Aerospace Manufacturing and Rework Facilities - Primer and Top Coat Application See Facility Wide Emission Sources -Section 2.2 A.2.  * The carbon adsorption capture system (ID No. CD-D0226B) installed on paint booth (ID No. D0226) will not be utilized for 40 CFR 63 Subpart GG compliance. However, if the carbon adsorption capture system (ID No. CD-D0226B) is utilized for compliance with 40 CFR 63.745(d), then the owner or operator shall conduct an initial performance test pursuant to 40 CFR 63.749(d) to demonstrate compliance with the overall reduction efficiency according the procedures of 40 CFR 63.750(g) unless a waiver is obtained under 40 CFR 63.7(e)(2)(iv) or 63.7(h) is obtained.	15A NCAC 02D .1111 40 CFR Part 63, Subpart GG
TAPS	Annual Emissions Rates for Toxic Air Pollutants Determined Pursuant to Acceptable Ambient Concentration Limits See Facility Wide Emission Rates -Section 2.2 B.2.	15A NCAC 02D .1100

#### 1. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from all paint booths except for (ID No. C0056 and D0106) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]
- b. Visible emissions from paint booth (ID No. C0056 and D0106) shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity. [15A NCAC 02D .0521 (c)]

#### Testing [15A NCAC 02Q .0508(f)]

c. If emission testing is required, the testing shall be performed in accordance General Condition JJ. If the results of this test are above the limit given in Section 2.1. A.1.a. or b. above in this building section, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

#### Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

- d. No monitoring, recordkeeping or reporting is required.
- B. Building 133: Abrasive blasting operation (ID No. E0080) with cartridge filter venting to HEPA filter (ID No. CD-E0080)
  - Building 137: Abrasive blasting operation (ID No. D0097) with cartridge filter (ID No. CD-D0097)
  - Building 423: Laser depainting system (ID No. D0221) with associated dry particulate cartridge filter system (CD-D0221, 80 square feet of surface area) with add-on HEPA filter system (66 square feet of surface area)
  - Building 1798: Abrasive blasting operation (ID No. D0053) with cartridge filter venting to HEPA filters (ID No. CD-D0053)
  - Building 3766: Abrasive blasting operation (ID No. D0184) venting thru multiple filter banks (ID No. CD-D0184)

Permit No. 05506T44 Page 11

Building 4034: Abrasive blasting operation (ID No. D0182) with three two-stage filter systems (ID Nos. CD-D0182A/B, CD-D0182C/D, and CD-D0182E/F),

Media recovery unit 1 of 2 (ID No. D0183) with two-stage filter system (ID No. CD-D0183A/B), and

Media recovery unit 2 of 2 (ID No. D0205) with two-stage filter system (ID No. CD-D0205A/B)  $\,$ 

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
HAP and VOC	MACT Standards for Aerospace Manufacturing and Rework Facilities - Non-Chemical Depainting Operations See Facility Wide Emission Sources -Section 2.2 A.3.	15A NCAC 02D .1111 40 CFR Part 63, Subpart GG
Visible emissions	20 percent opacity for all sources listed above except ID No. D0097	15A NCAC 02D .0521
Visible emissions	40 percent opacity for ID No. D0097	15A NCAC 02D .0521
TAPS	Annual Emissions Rates for Toxic Air Pollutants Determined Pursuant to Acceptable Ambient Concentration Limits See Facility Wide Emission Rates -Section 2.2 B.2.	15A NCAC 02D .1100

#### 1. 15A NCAC 02D .0521: Control of Visible Emissions

- a. Visible emissions from all sources described above except for (I.D. No. D0097) shall not be more than 20 percent opacity each when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]
- b. Visible emissions from abrasive booth (ID No. D0097) shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity. [15A NCAC 02D .0521 (c)]

#### Testing [15A NCAC 02Q .0508(f)]

c. If emission testing is required, the testing shall be performed in accordance with General Condition JJ in Section 3 of this Permit. If the results of this test are above the limit given in Section 2.1. B.1.a. above in this building section, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

#### Monitoring [15A NCAC 02Q .0508(f)]

d. To ensure compliance, once per month, the Permittee shall observe the pressure drop readings on the control device filter system table below and make a record of the readings in a logbook (written or electronic). The pressure drop across the filter systems in inches of water (ΔP wg) shall not be less than the minimum or greater than the maximum pressure drops tabulated below; except as stated in any ongoing administrative amendments.

Control Device I.D. No.	Control Device Component	Minimum (ΔP wg)	Maximum (ΔP wg)
CD-E0080	Cartridge Filter	1.0 inches	7.0 inches
CD-E0080	HEPA Filter	0.9 inches	2.25 inches
CD-D0097	Cartridge Filter	0.5 inches	4.0 inches
CD-D0221	Cartridge Filter	0.25 inches	20 inches

Control Device I.D. No.	Control Device Component	Minimum (ΔP wg)	Maximum (ΔP wg)
CD-D0221	HEPA Filter	0.25 inches	3.0 inches
CD-D0053	Cartridge Filter	1.0 inches	6.5 inches
CD-D0053	HEPA Filter	0.7 inches	2.5 inches
CD-D0184/A1	Cartridge Filter	0.5 inches	5.0 inches
CD-D0184/A2	Cartridge Filter	0.5 inches	5.0 inches
CD-D0184/A3	Cartridge Filter	0.5 inches	5.0 inches
CD-D0182A	Cartridge Filter	0.10 inches	10.0 inches
CD-D0182B	HEPA Filter	0.10 inches	5.0 inches
CD-D0182C	Cartridge Filter	0.10 inches	10.0 inches
CD-D0182D	HEPA Filter	0.10 inches	5.0 inches
CD-D0182E	Cartridge Filter	0.10 inches	10.0 inches
CD-D0182F	HEPA Filter	0.10 inches	5.0 inches
CD-D0183A	Cartridge Filter	0.25 inches	6.0 inches
CD-D0183B	HEPA Filter	0.20 inches	2.0 inches
CD-D0205A	Cartridge Filter	0.40 inches	6.0 inches
CD-D0205B	HEPA Filter	0.20 inches	2.0 inches

The Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521 if the pressure drop across the filter system operates outside of these parameters.

#### Recordkeeping [15A NCAC 02Q .0508(f)]

- e. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting this source's emissions were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

#### Reporting [15A NCAC 02Q .0508(f)]

- f. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.
- C. Building 137: Paint stripping tank (ID No. A0145)
  Depainting/chemical stripping area (ID No. D0120)
  - Building 423: Laser depainting system (ID No. D0221) with associated dry particulate cartridge filter system (CD-D0221, 80 square feet of surface area) with add-on HEPA filter system (66 square feet of surface area)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits and Standards	Applicable Regulation
Visible emissions	20 percent opacity for ID No. D0221 only. See section 2.1 B. for requirements	15A NCAC 02D .0521

Permit No. 05506T44

Page 13

HAP and VOC	MACT Standards for Aerospace Manufacturing and Rework Facilities - Chemical Depainting Operations See Facility Wide Emission Sources -Section 2.2 A.4.	15A NCAC 02D .1111 40 CFR Part 63, Subpart GG
TAPS	Annual Emissions Rates for Toxic Air Pollutants Determined Pursuant to Acceptable Ambient Concentration Limits See Facility Wide Emission Sources -Section 2.2 B.2.	15A NCAC 02D .1100

D. Building 133: High velocity oxygenated fuel (HVOF) thermal spray booth (ID No. A0009) with cartridge filter (ID No. CD-A0009) venting to shared HEPA filter CD-A0012 and Two high velocity oxygenated fuel (HVOF) thermal spray booths (ID Nos. A0010 and A0011) with cartridge filter (ID No. CD-A0010) both venting to shared HEPA filter CD-A0012

Building 4225: High velocity oxygenated fuel (HVOF) thermal spray booth (ID No. E0089) with cartridge/HEPA filter system (ID No. CD-E0089)
High velocity oxygenated fuel (HVOF) thermal spray booth (ID No. E0165) with

High velocity oxygenated fuel (HVOF) thermal spray booth (ID No. E0165) with cartridge/HEPA filter system (ID No. CD-E0165)

High velocity oxygenated fuel (HVOF) thermal spray booth (ID No. E0207) with a surface pretreatment process. Booth control device is scrubber (ID No. CD-E0207A) and surface pretreatment process control device is cyclone (ID No. CD-E0207B).

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \text{ (P)}^{0.67} \text{ (For process weight rates} \le 30 \text{ ton)}$ Where $P = \text{process weight rate (tons/hour)}$ $E = \text{allowable emission rate for particulate (lbs/hr)}$	15A NCAC 02D .0515
Sulfur dioxide	2.3 lbs sulfur dioxide per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity	15A NCAC 02D .0521
TAPS	Annual Emissions Rates for Toxic Air Pollutants Determined Pursuant to Acceptable Ambient Concentration Limits See Facility Wide Emission Sources -Section 2.2 B.2.	15A NCAC 02D .1100

#### 1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

a. Emissions of particulate matter from HVOF thermal spray booths listed above shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 02D .0515(a)]

 $E = 4.10 \text{ x P}^{0.67}$  Where: E = allowable emission rate in pounds per hour P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

#### Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ in Section 3 of this Permit. If the results of this test are above the limit given in Section 2.1 D.1.a. above in this building section, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

#### Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

c. Particulate matter emissions from HVOF thermal spray booths listed above shall be controlled by the associated cartridge filter, HEPA filter, scrubber and/or cyclone. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there is no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- i. a monthly visual inspection of the system ductwork and material collection unit for leaks; and
- ii. an annual (for each 12 month period following the initial inspection) internal inspection of the control device housing structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the ductwork and control device housing are not inspected and maintained.

- d. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection;
  - iii. the results of any maintenance performed,
  - iv. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if these records are not maintained.

#### Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the cartridge filter/common HEPA filter within 30 days of a written request by the DAQ.
- f. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.
- 2. 15A NCAC 02D .0516: Sulfur Dioxide Emissions from Combustion Sources
  - a. Emissions of sulfur dioxide from the (HVOF) thermal spray booths listed above shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 02D .0516]

#### Testing [15A NCAC 02Q .0508(f)]

If emissions testing is required, the testing shall be performed in accordance with General Condition JJ in Section 3 of this Permit. If the results of this test are above the limit given in Section 2.1 D.2.a. above in this building section, the Permittee shall be deemed in noncompliance with 15A NCAC 02D 0516

#### Monitoring/Recordkeeping [15A NCAC 02Q .0508(f) and 15A NCAC 02D .0501(c)(4)(A)]

c. No monitoring, recordkeeping, or reporting is required for sulfur dioxide emissions from the combustion of propane, propylene, or hydrogen in these sources.

#### 3. 15A NCAC 02D .0521: Control of Visible Emissions

a. Visible emissions from the (HVOF) thermal spray booths listed above shall not be more than 20 percent opacity each when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

#### <u>Testing</u> [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ in Section 3 of this Permit. If the results of this test are above the limit given in Section 2.1. D.3.a. above in this building section, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.
- c. <u>Monitoring/Recordkeeping/Reporting</u> [15A NCAC 02Q .0508(f)] No monitoring, recordkeeping or reporting is required.

Permit No. 05506T44 Page 15

### E. Building 4035: Six hard chrome plating tanks (ID Nos. T0099, T0100, T0105, T0106, T0155, and T0218) with a four-stage composite mesh pad scrubber (ID No. CR2R)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
HAPs	MACT Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	15A NCAC 02D .1111 40 CFR Part 63, Subpart N

- 1. 40 CFR Part 63, Subpart N, "National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks"
  - a. As required by 40 CFR 63.342 (c)(1), during tank operation the concentration of total chromium in the exhaust gas stream discharged to the atmosphere for six hard chrome plating tanks (ID Nos. T0099, T0100, T0105, T0106, T0155, and T0218) in Building 4035 shall not exceed 0.015 mg/dscm.

#### MACT MONITORING AND WORK PRACTICE STANDARDS

- b. In addition to any other monitoring and work practice standards of the Environmental Protection Agency (EPA), the Permittee is required to:
  - i. In accordance with 40 CFR 63.342 (f)(1) the Permittee shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution practices, consistent with the operation and maintenance plan required by 40 CFR 63.342(f)(3).
  - ii. The Permittee shall prepare an <u>operation and maintenance plan</u> to be implemented and kept on site no later than January 25, 1997. The plan shall include the elements prescribed by 40 CFR 63.342(f)(3), which includes, but is not limited to:
    - (A) The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emission limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;
    - (B) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
    - (C) The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions;
    - (D) Work Practice Standards for composite mesh-pad systems:
      - (1) Once a quarter visually inspect the control device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the control device, and
      - (2) Once a quarter visually inspect the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist, and
      - (3) Once a quarter inspect the ductwork from the tank to control device to ensure there are no leaks, and
      - (4) Perform washdown of the composite mesh pads in accordance with the manufacturer specifications.
    - (E) If the plan fails to address or inadequately addresses an event that meets the characteristic of a malfunction, the plan shall be revised within 45 days after such an event occurs.
  - iii. Monitoring Requirements to demonstrate continuous compliance in accordance with 40 CFR 63.343(c):
    - (A) Monitoring Requirements for composite mesh-pad systems:
      - (1) The Permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that any affected source is operating. To be in compliance with the standards, the composite mesh pad system shall be operated within +/- 2 inches of water column of the pressure drop average value established during the initial compliance test.

- (2) In complying with the daily monitoring and recordkeeping requirements, the Permittee shall keep all required records: however, for each monitored source, the Permittee shall be allowed up to three days of missing records per six month period.
- (B) Monitoring equipment shall be installed and operated as defined by the procedures under 40 CFR 63.344(d).

#### MACT RECORDKEEPING REQUIREMENTS

- c. In addition to any other record keeping requirements of the Environmental Protection Agency (EPA), the Permittee is required to maintain the following records as defined under 40 CFR 63.346:
  - i. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of 40 CFR 63.342(f) and Table 1 of 40 CFR 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
  - ii. Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment;
  - iii. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment;
  - iv. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
  - v. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR 63.342(f)(3);
  - vi. Test reports documenting results of all performance tests;
  - vii. All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of 40 CFR 63.344(e);
  - viii. Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data is collected;
  - ix. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment;
  - x. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment;
  - xi. The total process operating time of the affected source during the reporting period;
  - xii. For sources using fume suppressants to comply with the standards, records of the date and time that fume suppressants are added to the electroplating or anodizing bath;
  - xiii. Any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements, if the source has been granted a waiver under 40 CFR 63.10(f);
  - xiv. All documentation supporting the notifications and reports required by 40 CFR 63.9, 63.10, and 63.347;
  - xv. All the days of missing records and the observations that immediately preceded and followed the missing records; and
  - xvi. All records shall be maintained for a period of 5 years in accordance with 40 CFR 63.10(b)(1).

#### MACT REPORTING REQUIREMENTS

- d. In addition to any other notification requirements of the Environmental Protection Agency (EPA), the Permittee is required to NOTIFY the Regional Supervisor, Division of Air Quality, in WRITING, of the following:
  - i. As required by 40 CFR 63.342(f)(iv), if actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by 40 CFR 63.342(f)(3)(i), the owner or operator shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event.

- ii. As required by 40 CFR 63.347(e), a notification of compliance status is required within 90 days following the completion of the initial performance test required by 40 CFR 63.7 and 40 CFR 63.343(b). The notification shall list for each affected source:
  - (A) The applicable emission limitation and the methods that were used to determine compliance with this limitation;
  - (B) The test report documenting the results of the performance test, which contains the elements required by 40 CFR 63.344(a), including measurements and calculations to support the special compliance provisions of 40 CFR 63.344(e) if these are being followed:
  - (C) The type and quantity of hazardous air pollutants emitted by the source reported in mg/dscm or mg/hr if the source is using the special provisions of 40 CFR 63.344(e) to comply with the standards.
  - (D) For each monitored parameter for which a compliant value is to be established under 40 CFR 63.343(c), the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit;
  - (E) The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirements, if methods differ from those identified in Subpart N;
  - (F) A description of the air pollution control technique for each emission point;
  - (G) A statement that the owner or operator has completed and has on file the operation and maintenance plan as required by the work practice standards in 40 CFR 63.342(f);
  - (H) A statement by the owner or operator of the affected source as to whether the source has complied with the provisions of this Subpart.
- iii. New and reconstructed sources are subject to the requirements of 40 CFR 63.345 and 40 CFR 63.347, including reporting requirements.
- iv. Ongoing compliance status reports for major sources:
  - In accordance with 40 CFR 63.347(g), the Permittee shall submit, semiannually (by July 30 of each year for the first half of the year, and by January 30 for the second half of the year) an ongoing compliance status summary report. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency is approved. The ongoing compliance status report shall contain, at a minimum:
  - (A) the company name and address of the affected source;
  - (B) an identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR 63.343(c);
  - (C) the relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status;
  - (D) the beginning and ending dates of the reporting period;
  - (E) a description of the type of process performed in the affected source;
  - (F) the total operating time of the affected source during the reporting period;
  - (G) a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes. [The Permittee shall be allowed up to 3 days of missing records per six-month period. The Permittee shall report the days of any missing records and the observations that immediately preceded and followed the missing records]
  - (H) a certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in 40 CFR 63.342(f) were followed in accordance with the operation and maintenance plan for the source;
  - (I) if the operation and maintenance plan required by 40 CFR 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40 CFR 63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed;
  - (J) a description of any changes in monitoring, processes, or controls since the last

Permit No. 05506T44 Page 18

reporting period;

- (K) The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- (L) the date of the report.
- F. Building 4035: nickel strike tank (ID No. T0074) with vertical packed-bed tower scrubber (ID No. AOH2) process plating tanks (ID Nos. T0127 and T0131) with vertical packed-bed scrubber (ID No. AOH3)

zinc nickel plating tank (ID No. T0184) with vertical packed-bed scrubber (ID No. AOH4) nickel strike tank (ID No. T0188) with vertical packed-bed scrubber (ID No. AOH4)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
TAPS	Annual Emissions Rates for Toxic Air Pollutants Determined Pursuant to Acceptable Ambient Concentration Limits See Facility Wide Emission Sources -Section 2.2 B.2.	15A NCAC 02D .1100

G. Building 133: Four distillate/distillate equivalent fuel-fired turbine engines-APU test

cells (ID Nos. A0001, A0002, A0003, and A0004)

Building 137: Seven distillate fuel/distillate equivalent fuel-fired turbine

engines-APU test cells (ID Nos. D0116, D0147, D0148, D0149, D0150, D0151, D0152)

Building 3402: Distillate/distillate equivalent fuel-fired turbine engine-APU test cell

(ID No. A0077)

Building 4188: Distillate fuel/distillate equivalent fuel-fired turbine engine-APU test cell

(ID No. A0058)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
HAPs	MACT Standards for Engine Test Cells/Stands	15A NCAC 02D .1111 40 CFR Part 63, Subpart PPPPP
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516

- 1. 40 CFR Part 63, Subpart PPPPP, "National Emission Standards for Engine Test Cells/Stands"
  - a. The facility is a major source of HAP and operates engine test cells/stands, therefore the facility is subject to 40 CFR 63, Subpart PPPPP. Each of the engine or test cells is used exclusively for testing combustion turbine engines. Per §63.9290(d)(1), the emission sources do not have to meet the requirements of this subpart and of subpart A of this part.
- 2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES
  - a. Emissions of sulfur dioxide from the test cells/test stands shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 02D .0516]
    - <u>Testing</u> [15A NCAC 02Q .0508(f)]
  - b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ in Section 3 of this Permit. If the results of this test are above the limit given in Section 2.1 G.2.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.
    - Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f) and 15A NCAC 02D .0501(c)(4)(A)]
  - c. No monitoring, recordkeeping, or reporting is required for sulfur dioxide emissions from the firing of distillate or distillate equivalent fuel in jet engine-APU test cells listed above.

Permit No. 05506T44

Page 19

### H. Building 84: Wood working operation and dust collection system (ID No. D0127) with one associated simple cyclone (104 inches in diameter, ID No. CD-D0127)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate emissions	Adequate ductwork and properly designed collectors	15A NCAC 02D .0512
Visible emissions	20 percent opacity	15A NCAC 02D .0521

#### 1. 15A NCAC 02D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

#### Monitoring [15A NCAC 02Q .0508(f)]

b. Particulate matter emissions from the wood working operation and dust collection system (ID No. D0127) shall be controlled by one simple cyclone (ID No. CD-D0127). To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include monthly external inspection of the ductwork, and cyclone, noting the structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if the ductwork and cyclone are not inspected and maintained.

#### Recordkeeping [15A NCAC 02Q .0508(f)]

- c. The results of inspection and maintenance for the cyclone shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection; and
  - iii. the results of maintenance performed on the cyclone.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if these records are not maintained.

#### Reporting [15A NCAC 02Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the cyclone within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

#### 2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

a. Visible emissions from woodworking operation (ID No. D0127) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

#### Testing [15A NCAC 02Q .0508(f)]

b. If emission testing is required, the testing shall be performed in accordance with General Condition JJ in Section 3 of this Permit. If the results of this test are above the limit given in Section 2.1. H.2.a. above in this building, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

#### Monitoring [15A NCAC 02Q .0508(f)]

c. To ensure compliance, monthly, the Permittee shall observe the emission points of this source for any visible emissions above normal. If visible emissions from this source are observed to be above normal, the Permittee

shall either: (a) be deemed to be in noncompliance with 15A NCAC 02D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .0501(c)(8) is below the limit given in Section 2.1. H.2.a. above in this building. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

#### Recordkeeping [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting that this source's emissions were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with  $15A\ NCAC\ 02D\ .0521$  if these records are not maintained.

#### Reporting [15A NCAC 02Q .0508(f)]

e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

#### I. Building 133: Solvent cleaning spray booth (ID No. B0040)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
VOC	MACT Standards for Aerospace Manufacturing and Rework Facilities - Cleaning Operations. See Facility Wide Emission Sources -Section 2.2 A.1.d.	15A NCAC 02D .1111 40 CFR Part 63, Subpart GG

#### 2.2- Multiple Emission Source(s) Specific Limitations and Conditions

#### A. Aerospace Rework and Manufacturing Facilities

### 1. 15A NCAC 02D .1111: EMISSION STANDARDS FOR AEROSPACE MANUFACTURING AND REWORK FACILITIES (40 CFR 63, Subpart GG) - Cleaning Operations

#### Housekeeping Measures [40 CFR 63.744(a)]

- a. Cleaning operations shall comply with the following requirements unless the cleaning solvent used is an approved cleaning solvent or contains HAP and VOC at concentrations less than 0.1 percent for carcinogens or 1.0 percent for non-carcinogens, as determined from manufacturer's representations.
  - i Approved cleaning solvents shall consist of:
    - (A) aqueous cleaning solvents in which water is the primary ingredient (greater than or equal to 80 percent by volume of cleaning solvent solution as applied must be water), detergents, surfactants, and bioenzyme mixtures and nutrients may be combined with the water along with a variety of additives, such as organic solvents (e.g., high boiling point alcohols), builders, saponifiers, inhibitors, emulsifiers, pH buffers, and antifoaming agents. Aqueous solutions must have a flash point greater than 93°C (200°F) (as reported by the manufacturer), and the solution must be miscible with water; and
    - (B) non-HAP hydrocarbon-based cleaners that are composed of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons and have a maximum vapor pressure of 7 mm Hg at 20 °C (3.75 inches water and 68° F).
  - ii. The Permittee shall:
    - (A) place used solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers;
    - (B) ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container; and
    - (C) use bags and containers of such design so as to contain the vapors of the cleaning solvent.
    - (D) Cotton-tipped swabs used for very small cleaning operations are exempt from the above requirements.
  - iii. The Permittee shall store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners (at 60 percent by volume water), used in aerospace cleaning operations in closed containers.
  - iv. The Permittee shall conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

Each affected cleaning operation shall be considered in noncompliance if the Permittee fails to institute and carry out the housekeeping measures required above. Incidental emissions resulting from the activation of pressure release vents and valves on enclosed cleaning systems are exempt.

#### Hand-Wipe Cleaning Operations [40 CFR 63.744(b)]

- b. Hand-wipe cleaning operations (excluding cleaning of spray gun equipment performed in accordance with the provisions of this permit) shall use cleaning solvents that meet one of the requirements specified below:
  - i. the cleaning solvent solution shall contain HAP and VOC at concentrations less than 0.1 percent for carcinogens or 1.0 percent for non-carcinogens, as determined from manufacturer's representations;
  - ii. the cleaning solvent shall be an approved cleaning solvent (Section 2.2 A.1.a.i)
  - iii. the cleaning solvent shall have a composite vapor pressure of 45 mm Hg (24.1 inches water) or less at 20  $^{\circ}$ C (68  $^{\circ}$ F).

#### Exempt Cleaning Operations [40 CFR 63.744(e)]

- iv. The following cleaning operations are exempt from the above requirements;
  - (A) cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;

- (B) cleaning during the manufacture, assembly, installation, maintenance, or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, or hydrazine);
- (C) cleaning and surface activation prior to adhesive bonding;
- (D) cleaning of electronic parts and assemblies containing electronic parts;
- (E) cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to-air heat exchangers and hydraulic fluid systems;
- (F) cleaning of fuel cells, fuel tanks, and confined spaces;
- (G) surface cleaning of solar cells, coated optics, and thermal control surfaces;
- (H) cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft;
- (I) cleaning of metallic and nonmetallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;
- (J) cleaning of aircraft transparencies, polycarbonate, or glass substrates;
- (K) cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing; and
- (L) cleaning operations, using non-flammable liquids, conducted within five feet of energized electrical systems. Energized electrical systems means any AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells and tail sections.

Affected hand-wipe cleaning operation shall be considered in compliance when all hand-wipe cleaning solvents, excluding those used for hand cleaning of spray gun equipment, meet the composition requirements specified above.

# Each Spray Gun Cleaning Operation [40 CFR 63.744(c)]

c. Spray gun cleaning operations in which spray guns are used for the application of coatings or any other materials that require the spray guns to be cleaned shall use one or more of the techniques, or their equivalent, specified below.

#### Enclosed Cleaning [40 CFR 63.744(c)(1)]

- i. The Permittee shall clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun.
  - (A) Cleaning shall consist of forcing solvent through the gun.
  - (B) If leaks are found during the monthly inspection, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found.
  - (C) If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed, and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.

# Nonatomized Cleaning [40 CFR 63.844(c)(2)]

- ii Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place.
  - (A) No atomizing air is to be used.
  - (B) Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.

### Disassembled Spray Gun Cleaning [40 CFR 63.844(c)(3)]

iii. Disassemble the spray gun and clean the components by hand in a vat that shall remain closed at all times except when in use, or soak the components in a vat that shall remain closed during the soaking period and when not inserting or removing components.

# Atomized Cleaning [40 CFR 63.844(c)(4)]

iv. Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

#### **Exemptions**

- v. The following cleaning operations are exempt from the above requirements;
  - (A) cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from these requirements; and
  - (B) spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC at concentrations less than 0.1 percent for carcinogens or 1.0 percent for non-carcinogens, as determined from manufacturer's representations.

An affected spray gun cleaning operation shall be considered in compliance when each of the above conditions is met.

# Flush Cleaning Operations [40 CFR 63.744(d)]

d. Flush cleaning operations, excluding those that approved composition (Section 2.2 A.1.a.i) or are semi-aqueous cleaning solvents (at least 60 percent by volume water as applied), shall empty the used cleaning solvent each time aerospace parts or assemblies, or components of a coating unit (with the exception of spray guns) are flush cleaned into an enclosed container or collection system that is kept closed when not in use or into a system with equivalent emission control. An affected flush cleaning operation shall be considered in compliance if the operating requirements specified above are implemented and carried out.

# Monitoring [40 CFR 63.751(a)]

e. The Permittee shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.

# Recordkeeping [40 CFR 63.752(b)]

- f. The Permittee shall maintain the following record for each cleaning operation, as appropriate.
  - i. The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
  - ii. For each cleaning solvent used in hand-wipe cleaning operations that complies with approved composition requirements (Section 2.2 A.1.a.i) or for semi-aqueous cleaning solvents (at least 60 percent by volume water as applied) used for flush cleaning operations:
    - (A) the name of each cleaning solvent used;
    - (B) all data and calculations that demonstrate that the cleaning solvent complies with one of the approved composition requirements (Section 2.2 A.1.a.i); and
    - (C) annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
  - iii. For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the approved composition requirements (Section 2.2 A.1.a.i), but has a composite vapor pressure of 45 mm Hg (24.1 inches water) or less at 20 °C (68 °F).
    - (A) the name of each cleaning solvent used;
    - (B) the composite vapor pressure of each cleaning solvent used;
    - (C) all vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent; and
    - (D) the amount (in gallons) of each cleaning solvent used each month at each operation.
  - iv. For each cleaning solvent used for the exempt hand-wipe cleaning operations that does not conform to the vapor pressure or composition requirements of Section 2.2 A.1.b.i through 2.2 A.1.b.iii.:
    - (A) the identity and amount (in gallons) of each cleaning solvent used each month at each operation; and
    - (B) a list of the exempt processes pursuant to Section 2.2 A.1.b.iv. to which the cleaning operation applies.

- v. A record of all leaks from enclosed spray gun cleaners identified pursuant to Section 2.2 A.1.e. that includes for each leak found:
  - (A) source identification;
  - (B) date leak was discovered; and
  - (C) date leak was repaired.

# <u>Reporting</u> [40 CFR 63.753(b)]

- g. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before November 1 of each calendar year for the preceding six-month period between March and August and May 1 of each calendar year for the preceding six-month period between September and February. The report shall submit the following information:
  - i. any instance where a noncompliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation;
  - ii. a list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in of Section 2.2 A.1.b.i through 2.2 A.1.b.iii.;
  - iii. any instance where a noncompliant spray gun cleaning method is used;
  - iv. any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and
  - v. if the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.

# 2. 15A NCAC 02D .1111: EMISSION STANDARDS FOR AEROSPACE MANUFACTURING AND REWORK FACILITIES (40 CFR 63, Subpart GG) - Primer and Top Coat Application Operations

# Standards for Primer and Topcoat Application operations (40 CFR 63.745)

- a. The Permittee shall conduct the handling and transfer of primers and topcoats to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.
- b. The Permittee shall comply with the organic HAP and VOC content limits specified below.
  - i. Organic HAP emissions from primers shall be limited to an organic HAP content level of no more than 350 g/L (2.9 lb/gal) of primer (less water), as applied.
  - ii. VOC emissions from primers shall be limited to a VOC content level of no more than 350 g/L (2.9 lb/gal) of primer (less water and exempt solvents), as applied.
  - iii. Organic HAP emissions from topcoats (including self priming topcoats) shall be limited to an organic HAP content level of no more than 420 g/L (3.5 lb/gal) of coating (less water) as applied.
  - iv. VOC emissions from topcoats (including self priming topcoats) shall be limited to a VOC content level of no more than 420 g/L (3.5 lb/gal) of coating (less water and exempt solvents) as applied.
  - v. <u>40 CFR 63.749(d)</u> Each 24 hours is considered to be a compliance test for each of the limits above.
- c. All primers and topcoats (including self-priming topcoats) shall be applied using approved application methods including; flow/curtain coating; dip coating; roll coating; brush coating; cotton tip swab application; electrodeposition coating; high volume low pressure (HVLP) spraying; electrostatic spray; or other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods with the exceptions of;
  - i. any situation that normally requires the use of an airbrush or an extension on the spray gun to properly reach limited access spaces;
  - ii. the application of coatings that contain fillers that adversely affect atomization with HVLP spray guns and that the permitting agency has determined cannot be applied by other approved application methods (i.e., flow/curtain coat application, dip coat application, roll coating, brush coating, cotton-tipped swab application, electro-deposition dip coating, or electrostatic spray application);

- centimeter (0.0005 inches) and that the DAQ has determined cannot be applied by other approved application methods (i.e., flow/curtain coat application, dip coat application, roll coating, brush coating, cotton-tipped swab application, electro-deposition dip coating, or electrostatic spray application);
- iv. the use of airbrush application methods for stenciling, lettering, and other identification markings;
- v. the use of hand-held spray can application methods; and
- vi. touch-up and repair operations.
- d. All application devices used to apply primers or topcoats (including self-priming topcoats) shall be operated according to company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times. Equipment modified by the facility shall maintain transfer efficiency equivalent to HVLP and electrostatic spray application techniques.
- e. The Permittee shall apply primer or topcoat coatings that are spray applied and contain inorganic HAP in a booth or hangar in which airflow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets. The air stream(s) from the operation shall be controlled with a dry particulate filter system certified by the equipment provider or Permittee using EPA Method 319 (40 CFR 63, Appendix A) to meet or exceed the efficiency data points as follows:
  - i. for existing affected sources with dry filters (two-stage arrestor) [40 CFR 63.745(g)(2)(i)(A)]:

	<u>Liquid Phase</u>
Filtration efficiency requirement	% Aerodynamic particle size range, μm
> 90	>5.7
> 50	>4.1
> 10	>2.2
	Solid Phase
Filtration efficiency requirement	% Aerodynamic particle size range, μm
> 90	>8.1
> 50	>5.0
> 10	>2.6

ii. For new affected sources with dry filters (three-stage arrestor) [40 CFR 63.745(g)(2)(ii)(A)]:

<u>I</u>	<u> Liquid Phase</u>
Filtration efficiency requirement	% Aerodynamic particle size range, μm
> 90	>2.0
> 80	>1.0
> 65	>0.42
<u>S</u>	Solid Phase
Filtration efficiency requirement	% Aerodynamic particle size range, μm
> 90	>2.5
> 85	>1.1
> 75	>0.70

iii. The air stream(s) from the existing hangar coating operation (ID No. D0129) shall be controlled with a three stage dry particulate filter system [40 CFR 63.745(g)(2)(iii)(B)].

This provision does not apply to: touch-up of scratched surfaces or damaged paint; hole daubing for fasteners; touch-up of trimmed edges; coating prior to joining dissimilar metal components; stencil operations performed by brush or air brush; section joining; touch-up of bushings and other similar parts; sealant detackifying; the use of hand-held spray can application methods; and the painting of parts in the general hangar areas of Buildings 133, 137, 188, 1665, 4032, 4036, and 4224 where it is not technically feasible to paint parts in a spray booth.

f. <u>40 CFR 63.743(b)</u>. The Permittee shall operate the dry filter system in accordance with the manufacturer's instructions (exempt from a startup, shut down, and malfunction plan requirements).

# Monitoring and Recordkeeping

- g. The dry particulate filter systems on coating operations shall be maintained in good working order and have differential pressure gauges installed across the filter banks.
  - i. The pressure drop across a filter bank shall be continuously monitored, and a value read and recorded once per shift in a log.
    - (A) 40 CFR 63.752(d)(3) The log shall include the acceptable limits of pressure drop as specified in this permit.
    - (B) Pursuant to the EPA accepted recordkeeping waiver [40 CFR 63.10(f)], the Permittee is allowed three days (nine shifts) of absent pressure drop records per monitor per semi-annual reporting period.
  - ii. Pursuant to 40 CFR 63.745(g)(3), if the pressure drop across a dry particulate filter bank is below the minimum or above the maximum pressure drop values (DP wg) specified by the filter manufacturer or in locally prepared operating procedures, shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop is returned to within the specified limits.

For convenience, these values are contained in the following table, excluding any ongoing administrative amendments.

Control System ID No./ Filter Bank ID	Min (ΔP wg)	Max (ΔP wg)
Building	84	
CD-D0069 <sup>EAF</sup>	0.05	0.30
Building	129	
CD-D0061 <sup>EAF</sup>	0.25	0.60
CD-D0066 <sup>EAF</sup>	0.10	0.30
Building	133	
CD-A0019 <sup>NAF</sup>	0.03	0.55
CD-A0032 <sup>NAF</sup>	0.03	0.55
Building	245	
CD-D0106 <sup>EAF</sup> /651	0.20	1.6
CD-D0106 <sup>EAF</sup> /652	0.20	1.6
CD-D0106 <sup>EAF</sup> /653	0.20	1.6
CD-D0106 <sup>EAF</sup> /654	0.20	1.6
CD-D0106 <sup>EAF</sup> /655	0.20	1.6
CD-D0106 <sup>EAF</sup> /656	0.20	1.6
CD-D0106 <sup>EAF</sup> /657	0.20	1.6
CD-D0106 <sup>EAF</sup> /658	0.20	1.6
CD-D0106 <sup>EAF</sup> /659	0.20	1.6
CD-D0106 <sup>EAF</sup> /660	0.20	1.6
CD-D0106 <sup>EAF</sup> /661	0.20	1.6
CD-D0106 <sup>EAF</sup> /662	0.20	1.6
CD-D0106 <sup>EAF</sup> /663	0.20	1.6
CD-D0106 <sup>EAF</sup> /664	0.20	1.6
CD-D0106 <sup>EAF</sup> /665	0.20	1.6

Control System ID No./ Filter Bank ID	Min (ΔP wg)	Max (ΔP wg)	
Building	g 137		
CD-C0005 <sup>EAF</sup>	0.20	1.0	
CD-C0056 <sup>EAF</sup>	0.10	0.75	
CD-C0062 <sup>EAF</sup>	0.40	0.80	
CD-D0008 <sup>EAF</sup>	0.3	1.6	
CD-D0009 <sup>EAF</sup>	0.3	1.6	
CD-D0036 <sup>EAF</sup>	0.10	0.30	
CD-D0131 <sup>EAF</sup>	0.10	0.30	
Building	1798		
CD-D0052 <sup>EAF</sup> /DS050	0.05	1.60	
CD-D0052 <sup>EAF</sup> /DS051	0.05	1.60	
CD-D0052 <sup>EAF</sup> /DS052	0.05	1.60	
CD-D0052 <sup>EAF</sup> /DS053	0.05	1.60	
CD-D0052 <sup>EAF</sup> /DS054	0.05	1.60	
CD-D0052 <sup>EAF</sup> /DS055	0.05	1.60	
Building 3767			
CD-D0056 EAF	0.10	0.30	
Building 4032			
CD-A0179 <sup>NAF</sup>	0.01	2.00	
Building 4224			
CD-B0101 <sup>EAF</sup>	0.10	0.40	
Building	4225		
CD-E0160 EAF	0.1	1.0	

Control System ID No./ Filter Bank ID	Min (ΔP wg)	Max (ΔP wg)	Control System ID No./ Filter Bank ID	Min (ΔP wg)	Max (ΔP wg)
CD-D0106 <sup>EAF</sup> /666	0.20	1.6			
CD-D0129 <sup>IAF</sup> /A	0.10	2.0			
CD-D0129 <sup>IAF</sup> /B	0.10	2.0			
CD-D0226 <sup>NAF</sup> /A	TBD	TBD			
CD-D0226 <sup>NAF</sup> /B	TBD	TBD			

- Existing affected facility for NESHAP applicability and control requirements
- Interim affected facility for NESHAP applicability and control requirements
- New affected facility for NESHAP applicability and control requirements
- TBD To be determined
- iii. If the booth manufacturer's maintenance procedures for the filter have not been performed as scheduled, shut down the operation immediately and take corrective action.
- iv. 40 CFR 63.10(b) The Permittee shall keep records of:
  - (A) the occurrence and duration of each startup, shutdown, or malfunction of the coating operation;
  - (B) the occurrence and duration of each malfunction of the dry filter bank and/or pressure drop monitoring equipment;
  - (C) all required maintenance performed on the dry filter bank and pressure drop monitoring equipment;
  - (D) when actions are different from the procedures specified in the SSMP, all actions that were taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation);
  - (E) each period during which the pressure drop monitoring equipment is malfunctioning or inoperative (including out-of-control periods);
  - (F) all results of performance tests and continuous monitor system performance evaluations;
  - (G) all measurements, as may be necessary, to determine the conditions of performance tests and performance evaluations;
  - (H) all continuous monitoring system calibration checks;
  - (I) all adjustments and maintenance performed on continuous monitor system;
  - (J) all required continuous monitoring system measurements (including monitoring data recorded during unavoidable continuous monitoring system breakdowns and out-ofcontrol periods);
  - (K) the date and time identifying each period during which the continuous monitoring system was inoperative except for zero (low-level) and high-level checks;
  - (L) the date and time identifying each period during which the continuous monitoring system was out of control, as defined in 40 CFR 63.8(c)(7);
  - (M) the date and time of commencement and completion of each period of parameter monitoring exceedances, that occur during startups, shutdowns, and malfunctions;
  - (N) the date and time of commencement and completion of each period of parameter monitoring exceedances that occur during periods other than startups, shutdowns, and malfunctions:
  - (O) the nature and cause of any malfunction (if known);
  - (P) the corrective action taken or preventive measures adopted;
  - (Q) the nature of the repairs or adjustments to the continuous monitoring system that was inoperative or out of control;
  - (R) the total process operating time during the reporting period;
  - (S) all procedures that are part of a quality control program developed and implemented for continuous monitoring system under 40 CFR 63.8(d).
- h. 40 CFR 63.752(c) The Permittee shall record the following information, as appropriate.
  - i. The name and VOC content as received and as applied of each primer and topcoat used at the facility.
  - ii. For compliant (uncontrolled) primers and topcoats:

- (A) the mass of organic HAP emitted per unit volume of coating as applied (less water) (H<sub>i</sub>) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G<sub>i</sub>) for each coating formulation within each coating category used each month (as calculated using the procedures specified in 40 CFR 63.750(c) and (e));
- (B) all data, calculations, and test results (including EPA Method 24 results) used in determining the values of H<sub>i</sub> and G<sub>i</sub>; and
- (C) the volume (in gallons) of each coating formulation within each coating category used each month.
- iii. For "low HAP content" uncontrolled primers with organic HAP content less than or equal to 250 g/l (2.1 lb/gal) less water as applied and VOC content less than or equal to 250 g/l (2.1 lb/gal) less water and exempt solvents as applied:
  - (A) annual purchase records of the total volume of each primer purchased; and
  - (B) all data, calculations, and test results (including EPA Method 24 results) used in determining the organic HAP and VOC content as applied. These records shall consist of the manufacturer's certification when the primer is applied as received, or the data and calculations used to determine H<sub>i</sub> if not applied as received.

# Reporting

- i. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before November 1 of each calendar year for the preceding six-month period between March and August and May 1 of each calendar year for the preceding six-month period between September and February. The report shall submit the following information:
  - for primers and topcoats, each value of H<sub>i</sub> and G<sub>i</sub>, that exceeds the applicable organic HAP or VOC content limit;
  - ii. each exceedance of the pressure drop operating range established for the dry filter bank as specified in the permit;
  - iii. all times when a primer or topcoat application operation was not immediately shut down when the pressure drop across the dry particulate filter system was outside the limits specified in this permit;
  - iv. if the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards; and
  - v. the Permittee shall report the number of shifts of the missing records and the observations that immediately preceded and followed the missing records.
- j. The Permittee shall submit a summary report of listing the number of times the pressure drop for each dry filter was outside the limit(s) specified in the permit postmarked on or before January 30 of each calendar year for the preceding 12-month period.

# 3. 15A NCAC 02D .1111: EMISSION STANDARDS FOR AEROSPACE MANUFACTURING AND REWORK FACILITIES (40 CFR 63, Subpart GG) - Non-Chemical Depainting Operations

- a. 40 CFR 63.746(a) These provisions apply to the depainting of the outer surface areas of completed aerospace vehicles, including the fuselage, wings, and vertical and horizontal stabilizers of the aircraft, and the outer casing and stabilizers of missiles and rockets. These provisions do not apply to the depainting of radomes and of parts, subassemblies, and assemblies normally removed from the primary aircraft structure before depainting. However, depainting of wings and stabilizers is always subject to the requirements of this section regardless of whether their removal is considered by the Permittee to be normal practice for depainting. Aerospace vehicles or components that are intended for public display, no longer operational, and not easily capable of being moved are also exempt.
- b. <u>40 CFR 63.746(b)(4)</u> The depainting operation that generates airborne inorganic HAP emissions from dry media blasting equipment, except mechanical and hand sanding operations, shall also comply with the following requirements:
  - perform the depainting operation in an enclosed area, unless a closed-cycle depainting system is used:
  - ii. pass any air stream removed from the enclosed area or closed-cycle depainting system through a dry particulate filter system, certified using the EPA reference method 319 (40 CFR 64, Appendix A) to meet or exceed the following efficiency data points for existing affected sources before exhausting it to the atmosphere;

#### Liquid Phase

Filtration efficiency requirement	% Aerodynamic particle size range, µm
> 90	>5.7
> 50	>4.1
> 10	>2.2
<u>Solid</u>	Phase
Filtration efficiency requirement	% Aerodynamic particle size range, μm
> 90	>8.1
> 50	>5.0
> 10	>2.6

- iii. <u>40 CFR 63.743(b)</u> The Permittee shall operate the dry filter system in accordance with the manufacturer's instructions (exempt from a startup, shut down, and malfunction plan requirements); or prepare and operate in accordance with a startup, shutdown, and malfunction plan (SSMP) developed for locally prepared operating procedures.
  - (A) The SSMP shall specify the operation and maintenance criteria for the dry filter system and shall include a standardized checklist to document the operation and maintenance of the equipment.
  - (B) The SSMP shall include a systematic procedure for identifying malfunctions and for reporting them immediately to supervisory personnel.
  - (C) The SSMP shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - (D) 40 CFR 63.6(e)(3)(i) The SSMP must describe, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard.
  - (E) <u>40 CFR 63.6(e)(3)(ii)</u> During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the dry media blasting equipment and dry filter control equipment in accordance with the procedures specified in the SSMP.
  - (F) 40 CFR 63.6(e)(3)(v) The Permittee must maintain at the affected source a current SSMP and must make the plan available upon request for inspection and copying by the DAQ.
    - (1) If the SSMP is subsequently revised, the Permittee must maintain at the affected source each previous (i.e., superseded) version of the SSMP, and must make each such previous version available for inspection and copying by the DAQ for a period of 5 years after revision of the plan.
    - (2) If at any time after adoption of a SSMP the affected source ceases operation or is otherwise no longer subject to the provisions of this permit, the Permittee must retain a copy of the most recent plan for 5 years from the date the source ceases operation or is no longer subject to this permit and must make the plan available upon request for inspection and copying by the DAO.
    - (3) The DAQ may at any time request in writing that the Permittee submit a copy of any SSMP (or a portion thereof) which is maintained at the affected source or in the possession of the Permittee. Upon receipt of such a request, the Permittee must promptly submit a copy of the requested plan (or a portion thereof) to the DAQ.
    - (4) The DAQ must request that the Permittee submit a particular SSMP (or a portion thereof) whenever a member of the public submits a specific and reasonable request to examine or to receive a copy of that plan or portion of a plan.
    - (5) The Permittee may elect to submit the required copy of any SSMP to the DAQ in an electronic format.
    - (6) If the Permittee claims that any portion of such a startup, shutdown, and malfunction plan is confidential business information entitled to protection from disclosure under section 114(c) of the Act or 40 CFR 2.301, the material which is claimed as confidential must be clearly designated in the submission.

- (G) 40 CFR 63.6(e)(3)(vi) The Permittee may use the affected source's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this section and are made available for inspection or submitted when requested by the DAQ.
- (H) 40 CFR 63.6(e)(3)(vii) The DAQ may require that the Permittee make changes to the SSMP for that source. The DAQ must require appropriate revisions to a SSMP, if the DAQ finds that the plan:
  - (1) does not address a startup, shutdown, or malfunction event that has occurred;
  - (2) fails to provide for the operation of the source (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i);
  - (3) does not provide adequate procedures for correcting malfunctioning process and/or air pollution control and monitoring equipment as quickly as practicable; or
  - (4) includes an event that does not meet the definition of startup, shutdown, or malfunction listed in 40 CFR 63.2.
- (I) 40 CFR 63.6(e)(3)(viii) The Permittee may periodically revise the SSMP as necessary to satisfy the requirements of this permit or to reflect changes in equipment or procedures. Unless the DAQ provides otherwise, the Permittee may make such revisions to the SSMP without prior approval. However, each such revision to a SSMP must be reported in the semiannual reports required by this permit.
- (J) 40 CFR 63.6(e)(3)(viii) If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSMP at the time the Permittee developed the plan, the Permittee must revise the SSMP within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control and monitoring equipment.
- (K) 40 CFR 63.6(e)(3)(viii) In the event that the Permittee makes any revision to the SSMP which alters the scope of the activities at the source which are deemed to be a startup, shutdown, or malfunction, or otherwise modifies the applicability of any emission limit, work practice requirement, or other requirement of this permit, the revised plan shall not take effect until after the Permittee has provided a written notice describing the revision to the DAQ.
- (L) 40 CFR 63.6(e)(3)(ix) Any revisions made to the SSMP in accordance with the procedures by this permit shall not be deemed to constitute permit revisions under the Title V permit program. Moreover, none of the procedures specified by the SSMP for an affected source shall be deemed to fall within the permit shield provision in section 504(f) of the Act (15A NCAC 02Q .0512).
- (M) <u>40 CFR 64.749(b)</u> The affected facility shall be considered in noncompliance if the Permittee fails to submit a SSMP.

#### Monitoring and Recordkeeping

- c. 40 CFR 63.746(b)(4)(iii), 64.751(d), 63.752(e)(7) The dry particulate filter system on the dry media blasting equipment (ID Nos. D0053, D0097, D0182, D0183, D0184, D0205, D0221, and E0080) shall be maintained in good working order and have a differential pressure gauge installed across the filter banks.
  - i. 40 CFR The pressure drop across the filter bank shall be continuously monitored, and a value read and recorded once per shift in a log.
    - (A) <u>40 CFR 63.752(e)(7)</u> The log shall include the acceptable limits of pressure drop as specified in this permit; except as stated in any ongoing administrative amendments.
    - (B) Pursuant to the EPA accepted recordkeeping waiver [40 CFR 63.10(f)], the Permittee is allowed three days of absent pressure drop records per monitor per semi-annual reporting period.
  - ii. 40 CFR 63.746(b)(4)(v) If the pressure drop across a cartridge filter or HEPA filter is less than the minimum or greater than the maximum pressure drops tabulated in Section 2.1 B.1.d.; except as stated in any ongoing administrative amendments, shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop is returned to within the specified limits.

- iii. 40 CFR 63.6(e)(3)(iii) When actions taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the SSMP, the Permittee shall keep records for that event that demonstrate that the procedures specified in the plan were followed. These records may take the form of a "checklist," or other effective form of recordkeeping, that confirms conformance with the SSMP for that event.
- iv. 40 CFR 63.10(b) The Permittee shall keep records of:
  - (A) the occurrence and duration of each startup, shutdown, or malfunction of the dry media blasting equipment;
  - (B) the occurrence and duration of each malfunction of the dry filter bank and/or pressure drop monitoring equipment;
  - (C) all required maintenance performed on the dry filter bank and pressure drop monitoring equipment;
  - (D) when actions are different from the procedures specified in the SSMP, all actions that were taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation);
  - (E) each period during which the pressure drop monitoring equipment is malfunctioning or inoperative (including out-of-control periods);
  - (F) all results of performance tests and continuous monitor system performance evaluations:
  - (G) all measurements, as may be necessary, to determine the conditions of performance tests and performance evaluations;
  - (H) all continuous monitoring system calibration checks;
  - (I) all adjustments and maintenance performed on continuous monitor system;
  - (J) all required continuous monitoring system measurements (including monitoring data recorded during unavoidable continuous monitoring system breakdowns and out-of-control periods);
  - (K) the date and time identifying each period during which the continuous monitoring system was inoperative except for zero (low-level) and high-level checks;
  - (L) the date and time identifying each period during which the continuous monitoring system was out of control, as defined in 40 CFR 63.8(c)(7);
  - (M) the date and time of commencement and completion of each period of parameter monitoring exceedances, that occur during startups, shutdowns, and malfunctions;
  - (N) the date and time of commencement and completion of each period of parameter monitoring exceedances that occur during periods other than startups, shutdowns, and malfunctions;
  - (O) the nature and cause of any malfunction (if known);
  - (P) the corrective action taken or preventive measures adopted;
  - (Q) the nature of the repairs or adjustments to the continuous monitoring system that was inoperative or out of control;
  - (R) the total process operating time during the reporting period;
  - (S) all procedures that are part of a quality control program developed and implemented for continuous monitoring system under 40 CFR 63.8(d).
- v. 40 CFR 63.6(e)(3)(v) The Permittee shall keep the written SSMP on record after it is developed to be made available for inspection, upon request, by the DAQ for the life of the affected source or until the affected source is no longer subject to the provisions of this permit. In addition, if the SSMP is revised, the Permittee shall keep previous (i.e., superseded) versions of the startup, shutdown, and malfunction plan on record, to be made available for inspection, upon request, by the DAQ, for a period of 5 years after each revision to the plan.
- d. <u>40 CFR 63.752(e)(4)</u> The Permittee shall record a listing of the parts, subassemblies, and assemblies normally removed from the aircraft before depainting for each type of aircraft depainted at the facility. [Prototype, test model or aircraft that exist in low numbers (i.e., less than 25 aircraft of any one type) are exempt from this requirement.]

- e. 40 CFR 63.752(e)(5) The Permittee shall record for affected dry media blasting equipment:
  - the names and types of non-chemical based equipment; and
  - ii. for periods of malfunction,
    - (A) the non-chemical method or technique that malfunctioned;
    - (B) the date that the malfunction occurred;
    - (C) a description of the malfunction;
    - (D) the methods used to depaint aerospace vehicles during the malfunction period;
    - (E) the dates that these methods were begun and discontinued; and
    - (F) the date that the malfunction was corrected.

### Reporting

- f. <u>40 CFR 63.753(d)(1)</u> The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before November 1 of each calendar year for the preceding six-month period between March and August and May 1 of each calendar year for the preceding six-month period between September and February. The report shall submit the following information:
  - i. any 24-hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from the exempt operations listed in this permit.
  - ii. any new non-chemical depainting technique in use at the facility since the notification of compliance status or any subsequent semiannual report was filed;
  - iii. for periods of malfunctions:
    - (A) the non-chemical method or technique that malfunctioned;
    - (B) the date that the malfunction occurred;
    - (C) a description of the malfunction;
    - (D) the methods used to depaint aerospace vehicles during the malfunction period;
    - (F) the dates that these methods were begun and discontinued; and
    - (G) the date that the malfunction was corrected;
  - iv. all periods where a nonchemical depainting operation for the control of inorganic HAP emissions was not immediately shut down when the pressure drop were outside the limits specified in this permit;
  - v. a list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed for depainting for each new aircraft model being depainted;
  - vi. if the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards; and
  - vii. the Permittee shall report the number of shifts of the missing records and the observations that immediately preceded and followed the missing records.
- g. Annual reports occurring every 12 months from the date of the notification of compliance status that identify the number of times the pressure drop limit(s) for each filter system were outside the limit(s) specified in this permit.
- h. 40 CFR 63.6(e)(3)(iii) The Permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's SSMP in the semiannual startup, shutdown, and malfunction report.
- i. 40 CFR 63.6(e)(3)(iv) If an action taken by the Permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's SSMP, the Permittee shall record the actions taken for that event and shall report such actions within two working days after commencing actions inconsistent with the plan, followed by a letter within seven working days after the end of the event.

# 4. 15A NCAC 02D .1111: EMISSION STANDARDS FOR AEROSPACE MANUFACTURING AND REWORK FACILITIES (40 CFR 63, Subpart GG) - Chemical Depainting Operations

a. 40 CFR 63.746(a) - These provisions apply to the depainting of the outer surface areas of completed aerospace vehicles, including the fuselage, wings, and vertical and horizontal stabilizers of the aircraft, and the outer casing and stabilizers of missiles and rockets. These provisions do not apply to the depainting of radomes and of parts, subassemblies, and assemblies normally removed from the primary aircraft structure before depainting. However, depainting of wings and stabilizers is always subject to the requirements of this section regardless of whether their removal is considered by the Permittee to be normal practice for depainting. Aerospace vehicles or components that are intended for public display, no longer operational, and not easily capable of being moved are also exempt.

- b. <u>40 CFR 63.746(b)</u> An affected aerospace depainting operation shall emit no organic HAP from chemical stripping formulations and agents or chemical paint softeners except as follows.
  - Where non-chemical based equipment is used, either in total or in part;
    - (A) the Permittee shall operate and maintain the equipment according to the manufacturer's specifications or locally prepared operating procedures;
    - (B) the Permittee may use substitute materials for periods of malfunctions of such equipment during the repair period provided the substitute materials used are those available that minimize organic HAP emissions and provided the substitute materials are not used for more than 15 days annually (unless such materials are organic HAP-free).
  - ii The depainting operation shall not, on an annual average basis, use more than 50 gallons of organic HAP-containing chemical strippers or alternatively 365 pounds of organic HAP per military aircraft depainted for spot stripping and decal removal as determined using the procedures specified in 40 CFR 63.750(j) for the value C.

# Monitoring and Recordkeeping

- c. <u>40 CFR 63.752(e)(1)</u> The Permittee shall record for all chemical strippers used in the depainting operation:
  - i. the name of each chemical stripper; and
  - ii. monthly volumes of each organic HAP containing chemical stripper used or monthly weight of organic HAP-material used for spot stripping and decal removal.
- d. <u>40 CFR 63.752(e)(4)</u> The Permittee shall record a listing of the parts, subassemblies, and assemblies normally removed from the aircraft before depainting for each type of aircraft depainted at the facility. [Prototype, test model or aircraft that exist in low numbers (i.e., less than 25 aircraft of any one type) are exempt from this requirement.]
- e. <u>40 CFR 63.752(e)(6)</u> The Permittee shall record the volume of organic HAP-containing chemical stripper or weight of organic HAP used for spot stripping and decal removal, the annual average volume of organic HAP-containing chemical stripper or weight of organic HAP used per aircraft for spot stripping and decal removal, the annual number of aircraft stripped, and all data and calculations used.

# Reporting

- f. <u>40 CFR 63.753(d)(1)</u> The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before November 1 of each calendar year for the preceding six-month period between March and August and May 1 of each calendar year for the preceding six-month period between September and February. The report shall submit the following information:
  - i. any 24-hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from the exempt operations listed in this permit.
  - ii. any new chemical strippers used at the facility during the reporting period and the organic HAP content of these new chemical strippers;
  - iii. the HAP content of each chemical stripper that undergoes reformulation;
  - iv. any new non-chemical depainting technique in use at the facility since the notification of compliance status or any subsequent semiannual report was filed;
  - a list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed for depainting for each new aircraft model being depainted; and
  - vi. if the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards.
- g. Annual reports occurring every 12 months and due on November 1 for the preceding year that identify the average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in this permit.

# 5. 15A NCAC 02D .1111: EMISSION STANDARDS FOR AEROSPACE MANUFACTURING AND REWORK FACILITIES (40 CFR 63, Subpart GG) – Chemical Milling Maskant Application Operations

Standards for Chemical Milling Maskant Application Operations (40 CFR 63.747)

- a. The Permittee shall conduct the handling and transfer of chemical milling maskants to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.
- b. The Permittee shall comply with the organic HAP and VOC content limits for each uncontrolled chemical milling maskant specified below.
  - i. Organic HAP emissions from chemical milling maskants shall be limited to an organic HAP content level of no more than 622 g/L (5.2 lb/gal) of Type I chemical milling maskant (less water), as applied.
  - ii. VOC emissions from chemical milling maskants shall be limited to a VOC content level of no more than 622 g/L (5.2 lb/gal) of Type I chemical milling maskant (less water and exempt solvents), as applied.
  - iii. Organic HAP emissions from chemical milling maskants shall be limited to an organic HAP content level of no more than 160 g/L (1.3 lb/gal) of Type II chemical milling maskant (less water) as applied.
  - iv. VOC emissions from chemical milling maskants shall be limited to a VOC content level of no more than 160 g/L (1.3 lb/gal) of Type II chemical milling maskant (less water and exempt solvents) as applied.
  - v. Organic HAP and VOC content levels do not apply to the touch-up of scratched surfaces or damaged maskant; and the touch-up of trimmed edges.
  - vi. 40 CFR 63.749(h) Each 24 hours is considered a performance test for each of the limits above.

### Monitoring and Recordkeeping

- c. <u>40 CFR 63.752(f)(1)</u> The Permittee shall record for all uncontrolled chemical milling maskants that meet the organic HAP or VOC content limit without averaging:
  - i. the mass of organic HAP emitted per unit volume of chemical milling maskant as applied (less water) (H<sub>i</sub>) and the mass of VOC emitted per unit volume of chemical milling maskant as applied (less water and exempt solvents) (G<sub>i</sub>) for each chemical milling maskant formulation used each month (as determined by the procedures specified in 40 CFR 63.750 (k) and (m)); and
  - ii. all data, calculations, and test results (including EPA Method 24 results) used in determining the values of H<sub>i</sub> and G<sub>i</sub>; and
  - iii. the volume (gal) of each chemical milling maskant formulation used each month.

#### Reporting

- d. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before November 1 of each calendar year for the preceding six-month period between March and August and May 1 of each calendar year for the preceding six-month period between September and February. The report shall submit the following information:
  - i. each value of H<sub>i</sub> and G<sub>i</sub> that exceeds the applicable organic HAP or VOC content limits;
  - ii. a list of all chemical milling maskants currently in use that were not listed in the notification of compliance status or any other subsequent annual report; and
  - iii. if the chemical milling maskant application operations have been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards.

Affected chemical milling maskant application operations shall be considered in compliance when all chemical milling maskants, meet the standards and requirements specified above.

6. 15A NCAC 02D .1111: EMISSION STANDARDS FOR AEROSPACE MANUFACTURING AND REWORK FACILITIES (40 CFR 63, Subpart GG) - Handling And Storage Of Waste

<u>40 CFR 63.748</u> - The Permittee shall conduct the handling and transfer of the waste to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills for each waste that is not subject to the Resource Conservation and Recovery Act (RCRA) and contains HAP.

### **B.** Toxic Air Pollutant Emission Sources

# **STATE-ONLY REQUIREMENT:**

# 1. 15A NCAC 02D .1100 TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REPORTING REQUIREMENT

Pursuant to 15A NCAC 02D .1100 and in accordance with the facility permit application for an air toxic compliance modeling demonstration approved by the Division of Air Quality per memo on March 21, 2016, the modeled non-MACT/NESHAP source by source emission limits for non-specific Chromium (VI) Compounds listed in the table below shall not be exceeded. To ensure compliance with these regulations the Permittee shall maintain records of production rates, throughput, material usage, and other process operational information as is necessary to determine compliance with the air toxic emission limits specified below for a minimum of five years from the date of recording.

Non-specific Chromium (VI) Compounds, as Chromium (VI) Equivalent (CAS No. NSCR6)

Emission			
Source			NSCR6
ID No.	Building	<b>Emission Source Description</b>	pounds/year
ID0122	83	Welding Booth	5.13E-02
ID0123	83	Welding Booth	5.13E-02
ID0124	83	Welding Booth	5.13E-02
ID0130	83	Welding Room	5.13E-02
IA0104	133	Welding Booth	1.65E-02
IC0011	137	Welding Booth	3.03E-02
IC0012	137	Welding Booth	3.03E-02
IC0013	137	Welding Booth	3.03E-02
IC0014	137	Welding Booth	3.03E-02
IC0015	137	Welding Booth	3.03E-02
IC0044	137	Welding Booth	3.03E-02
IC0045	137	Welding Booth	3.03E-02
IC0046	137	Welding Booth	3.03E-02
IC0047	137	Welding Booth	3.03E-02
IC0048	137	Welding Booth	3.03E-02
IC0070	137	Welding Booth	3.03E-02
ID0141	137	Grinding/Sanding Booth	1.00E-03
ID0168	137	Grinding/Sanding Booth	1.19E-04
ID0169	137	Grinding/Sanding Booth	1.19E-04
ID0227	137	Grinding/Sanding Booth	2.38E-04
ID0125	1798	Welding Booth	4.10E-02
ID0126	1798	Welding Booth	4.10E-02
ID0228	3767	Abrasive Blasting Glovebox	2.47E-06
IP0001	4035	Welding	4.10E-02
IB0052	4224	Welding Booth	1.23E-03
ID0218	4808	Grinding/Sanding Booth	7.81E-05

#### STATE ONLY REQUIREMENT

# 2. 15A NCAC 02D .1100: CONTROL OF TOXIC AIR POLLUTANTS – FACILITY WIDE EMISSION LIMITS

a. In accordance with the application for an air toxic compliance modeling demonstration approved by the Division of Air Quality per memo on March 21, 2016, the following facility wide modeled emission rates for TAPs above 50% AAL shall not be exceeded facility wide. The calculated emission rates below included MACT/NESHAP emission sources.

Toxic Air Pollutant	Modeled Emission Rate(s)	
Maleic Anhydride 108-31-6	7.03E-02 mg/m^3 (hourly)	
Non-specific Chromium VI Compounds (As chromium VI equivalent)	8.20E-08 mg/m^3 (annual)	

- b. Pursuant to 15A NCAC 02D .1104: Toxic Air Pollution Guidelines and in accordance with the application for an air toxic compliance modeling demonstration approved by the Division of Air Quality per memo on March 21, 2016, for the below listed toxic air pollutants (TAPs), the Permittee has modeled and demonstrated that facility-wide actual emissions do not exceed the Acceptable Ambient Levels (AAL) listed in 15A NCAC 02D .1104. The facility shall be operated and maintained in such a manner that emissions of any listed toxic air pollutant(s) from the facility, including fugitive emissions, will not exceed the AAL limit.
  - i. A permit to emit any of the below listed TAPs shall be required for this facility if actual emissions from all sources will become greater than the corresponding AAL.
  - ii. In accordance with the approved application, the Permittee shall maintain records of operational information demonstrating that the toxic air pollutant emissions do not exceed the AAL as listed below:

POLLUTANT	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Nickel Metal (7440-02-0)		6.0 E-03 mg/m <sup>3</sup>		
Nickel, Soluble Compounds, as Nickel		6.0 E-04 mg/m^3		

### Reporting of Facility-wide and Source Specific Modeled Toxic Air Pollutants

- c. To ensure compliance with the acceptable ambient model levels, the Permittee shall calculate hourly, daily and/or annual emissions, as required by the applicable averaging period, for each TAP listed in Section 2.2 B and compare the calculated emission with the modeled emissions listed in Sections 2.2 B.1, 2.2 B.2.a., 2.2 B.2.b. The Permittee shall submit a report due by July 30 of each emission rate listed in Section 2.2 B. that was exceeded in the preceding year. The report shall include:
  - a demonstration (ambient dispersion modeling or otherwise) that either shows that the toxic air pollutant ambient impact resulting from an emission limit exceedance did not or could not exceed the acceptable ambient level, or that the acceptable ambient level was exceeded;
  - ii. if the Permittee determines that an acceptable ambient level of a toxic air pollutant was (or is being) exceeded, the Permittee shall include an abatement plan for that toxic air pollutant;
  - iii. if no exceedances occurred, the Permittee shall state that there were no exceedances of the toxic air pollutant emission limits in the report.

# Toxic Air Pollutant Emission Limitations and Reporting Requirements for Scrubbers

- d. Toxic emissions shall be controlled by:
  - i. Vertical packed-bed tower wet scrubber (ID No. CR1),
  - ii. Vertical packed-bed tower wet scrubber (ID No. OH1),
  - iii. Vertical packed-bed tower wet scrubber (ID No. AOH1),
  - iv. Vertical packed-bed tower wet scrubber (ID No. AOH2),
  - v. Vertical packed-bed tower wet scrubber (ID No. AOH3),
  - vi. Vertical packed-bed tower wet scrubber (ID No. AOH4), and
  - vii. Venturi air scrubber (ID No. CD-E0207A).

### Monitoring Requirements for Scrubbers

- e. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the control device manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there is no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include:
  - i. annual inspection of scrubber spray nozzles to detect clogging or corrosion damage of nozzles and perform maintenance and repair when necessary to ensure proper operation of the scrubber;
  - ii. annual inspection of scrubber packing material to ensure proper packing depth and to check for clogging;
  - iii. semiannual inspection, cleaning, and calibration of all associated instrumentation.
- f. To ensure compliance, each week, the Permittee shall observe the pressure drop readings across the scrubbers. The Permittee shall record the reading in a logbook (written or electronic) for the pressure drop across each scrubber system in inches of water ( $\Delta P$  wg) which shall not be less than the minimum or greater than the maximum pressure drops tabulated below; except as stated in any ongoing administrative amendments.

Scrubber	Minimum (ΔP wg)	Maximum (ΔP wg)
CR1	0.4	2.7
OH1	0.75	3.0
AOH1	0.4	2.0
AOH2	0.4	2.7
АОН3	0.4	2.7
AOH4	0.4	2.7
CD-E0207A	TBD	TBD

The Permittee shall be deemed in noncompliance if the pressure drop is not recorded and maintained within the prescribed limits.

# Recordkeeping for Scrubbers

- g. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) onsite and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the pressure drop, recorded weekly;
  - iii. the results of each inspection;
  - iv. the results of any maintenance performed on the scrubber systems; and
  - v. any variance from manufacturer's recommendations, if any, and corrections made.

### Reporting for Scrubbers

- h. Within 30 days of a request from the DAQ, the Permittee shall submit a report of any maintenance performed on scrubbers.
- i. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

# <u>Toxic Air Pollutant (Nickel Metal) Emission Limitations and Reporting Requirements for Cartridge Filters, HEPA Filters, and/or Cyclone</u>

- j. Toxic air pollutants from the HVOF thermal spray booth (ID No. A0009) in Building 133 shall be controlled with a cartridge filter (ID No. CD-A0009) venting to a HEPA filter (ID No. CD-A0012).
- k. Toxic air pollutants from the two HVOF thermal spray booths (ID No. A0010 and A0011) in Building 133 shall be controlled with a cartridge filter (ID No. CD-A0010) venting to a HEPA filter (ID No. CD-A0012).
- 1. Toxic air pollutants from the HVOF thermal spray booth (ID No. E0089) in Building 4225 shall be controlled with a cartridge filter (ID No. CD-E0089) venting to a HEPA filter.
- m. Toxic air pollutants from the HVOF thermal spray booth (ID No. E0165) in Building 4225 shall be controlled with a cartridge filter (ID No. CD-E0165) venting to a HEPA filter.

n. Toxic air pollutants from the HVOF thermal spray booth's surface pretreatment process (ID No. E0207) in Building 4225 shall be controlled with cyclone (CD-E0207B).

# Monitoring Requirements for Cartridge, HEPA filters, and/or Cyclone

- o. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the control device manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there is no manufacturer's inspection and maintenance requirement shall include:
  - i. annual inspection of duct work and housing components for structural integrity;
  - ii. semiannual inspection, cleaning, and calibration of all associated instrumentation.
- p. To ensure compliance, each week, the Permittee shall observe the pressure drop readings across the control devices (ID Nos. CD-A0009, CD-A0010, CD-A0012, CD-E0089, CD-E0165, and CD-E0207B) for HVOF metal spray booths (ID Nos. A0009, A0010/0011, E0089, E0165, and E0207), respectively. The Permittee shall record the reading in a logbook (written or electronic) for the pressure drop across each cartridge filter, HEPA, and/or cyclone filter in each system in inches of water (ΔP wg) which shall not be less than the minimum or greater than the maximum pressure drops tabulated below; except as stated in any ongoing administrative amendments.

Cartridge Filter, HEPA Filter, and/or Cyclone	Minimum (ΔP wg)	Maximum (ΔP wg)
cartridge filter CD-A0009	0.10	6.0
cartridge filter CD-A0010	0.10	6.0
HEPA filter CD-A0012	0.05	5.0
cartridge/HEPA CD-E0089	TBD	TBD
cartridge filter CD-E0165	0.35	6.0
HEPA filter CD-E0165	1.0	6.0
cyclone CD-E0207B	TBD	TBD

The Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521 if the pressure drop across any filter operates outside of these parameters. New control devices CD-E0089 and CD-E0207 will be installed in the near term and CD-E0165 is a like for like replacement., therefore the pressure drop will be determined at a later date.

### Recordkeeping for Cartridge, HEPA filters, and/or Cyclone

- q. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) onsite and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the pressure drop, recorded weekly;
  - iii. the results of each inspection;
  - iv. the results of any maintenance performed on the control device systems; and
  - v. any variance from manufacturer's recommendations, if any, and corrections made.

# Reporting for Cartridge, HEPA filters, and/or Cyclone

- r. Within 30 days of a request from the DAQ, the Permittee shall submit a report of any maintenance performed on the control device.
- s. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

# SECTION 3 - GENERAL CONDITIONS (version 5.1, 08/03/2017)

This section describes terms and conditions applicable to this Title V facility.

# A. General Provisions [NCGS 143-215 and 15A NCAC 02Q .0508(i)(16)]

- 1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 02D and 02O.
- 2. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by the DAO.
- 3. This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.
- 4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.
- 5. Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
- 6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.

# B. **Permit Availability** [15A NCAC 02Q .0507(k) and .0508(i)(9)(B)]

The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of Department of Environmental Quality upon request.

# C. Severability Clause [15A NCAC 02Q .0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

#### D. **Submissions** [15A NCAC 02O .0507(e) and 02O .0508(i)(16)]

Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NOx budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:

Supervisor, Stationary Source Compliance North Carolina Division of Air Quality 1641 Mail Service Center Raleigh, NC 27699-1641

All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).

# E. **Duty to Comply** [15A NCAC 02Q .0508(i)(3)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

#### F. Circumvention - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

# G. Permit Modifications

- 1. Administrative Permit Amendments [15A NCAC 02Q .0514]
  - The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 02O .0514.
- 2. Transfer in Ownership or Operation and Application Submittal Content [15A NCAC 02Q .0524 and 02Q .0505] The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 02Q.0524 and 02Q .0505.
- 3. Minor Permit Modifications [15A NCAC 02Q .0515]
  - The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 02Q .0515.
- 4. Significant Permit Modifications [15A NCAC 02Q .0516]
  - The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 02Q .0516.
- 5. Reopening for Cause [15A NCAC 02Q .0517]
  - The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 02Q .0517.

# H. Changes Not Requiring Permit Modifications

1. Reporting Requirements

Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:

- a. changes in the information submitted in the application;
- b. changes that modify equipment or processes; or
- c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

# 2. Section 502(b)(10) Changes [15A NCAC 02Q .0523(a)]

- a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
- b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
  - i. the changes are not a modification under Title I of the Federal Clean Air Act;
  - ii. the changes do not cause the allowable emissions under the permit to be exceeded;
  - iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
  - iv. the Permittee shall attach the notice to the relevant permit.
- c. The written notification shall include:
  - i. a description of the change;
  - ii. the date on which the change will occur;
  - iii. any change in emissions; and
  - iv. any permit term or condition that is no longer applicable as a result of the change.
- d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
- 3. Off Permit Changes [15A NCAC 02Q .0523(b)]

The Permittee may make changes in the operation or emissions without revising the permit if:

- a. the change affects only insignificant activities and the activities remain insignificant after the change; or
- b. the change is not covered under any applicable requirement.
- 4. Emissions Trading [15A NCAC 02Q .0523(c)]

To the extent that emissions trading is allowed under 15A NCAC 02D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 02Q .0523(c).

# I.A <u>Reporting Requirements for Excess Emissions and Permit Deviations</u> [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

"Excess Emissions" - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 02D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 02Q .0700. (Note: Definitions of excess emissions under 02D .1110 and 02D .1111 shall apply where defined by rule.)

"<u>Deviations</u>" - for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.

#### **Excess Emissions**

- 1. If a source is required to report excess emissions under NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
- 2. If the source is not subject to NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 02D .0535 as follows:
  - a. Pursuant to 15A NCAC 02D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
    - i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
      - name and location of the facility;
      - nature and cause of the malfunction or breakdown;
      - time when the malfunction or breakdown is first observed;
      - expected duration; and
      - estimated rate of emissions;
    - notify the Regional Supervisor or Director immediately when corrective measures have been accomplished;
       and
    - iii. submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 02D .0535(f)(3).

### **Permit Deviations**

- 3. Pursuant to 15A NCAC 02Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) as follows:
  - a. Notify the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 02D .0535 quarterly. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

#### I.B Other Requirements under 15A NCAC 02D .0535

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 02D .0535, including 15A NCAC 02D .0535(c) as follows:

- 1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 02D .0535(c)(1) through (7).
- 2. 15A NCAC 02D .0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

# J. Emergency Provisions [40 CFR 70.6(g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of
the facility, including acts of God, which situation requires immediate corrective action to restore normal operation,
and that causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable
increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent

caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

- 2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in 3. below are met.
- 3. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
  - a. an emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - b. the permitted facility was at the time being properly operated;
  - c. during the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the standards or other requirements in the permit; and
  - d. the Permittee submitted notice of the emergency to the DAQ within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- 4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 5. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

# K. Permit Renewal [15A NCAC 02Q .0508(e) and 02Q .0513(b)]

This 15A NCAC 02Q .0500 permit is issued for a fixed term not to exceed five years and shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete 15A NCAC 02Q .0500 renewal application is submitted at least nine months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 02Q .0512(b)(1), this 15A NCAC 02Q .0500 permit shall not expire until the renewal permit has been issued or denied. Permit expiration under 15A NCAC 02Q .0400 terminates the facility's right to operate unless a complete 15A NCAC 02Q .0400 renewal application is submitted at least six months before the date of permit expiration for facilities subject to 15A NCAC 02Q .0400 requirements. In either of these events, all terms and conditions of these permits shall remain in effect until the renewal permits have been issued or denied.

# L. Need to Halt or Reduce Activity Not a Defense [15A NCAC 02Q .0508(i)(4)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

# M. <u>Duty to Provide Information (submittal of information)</u> [15A NCAC 02Q .0508(i)(9)]

- 1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
- 2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

# N. **Duty to Supplement** [15A NCAC 02Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

# O. Retention of Records [15A NCAC 02Q .0508(f) and 02Q .0508 (l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

# P. Compliance Certification [15A NCAC 02Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all federally-enforceable terms and conditions in the permit, including emissions

limitations, standards, or work practices. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

- 1. the identification of each term or condition of the permit that is the basis of the certification;
- 2. the compliance status (with the terms and conditions of the permit for the period covered by the certification);
- 3. whether compliance was continuous or intermittent; and
- 4. the method(s) used for determining the compliance status of the source during the certification period.

# Q. Certification by Responsible Official [15A NCAC 02Q .0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

# R. Permit Shield for Applicable Requirements [15A NCAC 02Q .0512]

- 1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
- 2. A permit shield shall not alter or affect:
  - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
  - b. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
  - c. the applicable requirements under Title IV; or
  - d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
- 3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 02Q .0523.
- 4. A permit shield does not extend to minor permit modifications made under 15A NCAC 02Q .0515.

#### S. Termination, Modification, and Revocation of the Permit [15A NCAC 02Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

- 1. the information contained in the application or presented in support thereof is determined to be incorrect;
- 2. the conditions under which the permit or permit renewal was granted have changed;
- 3. violations of conditions contained in the permit have occurred;
- 4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
- 5. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

# T. Insignificant Activities [15A NCAC 02Q .0503]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

# U. **Property Rights** [15A NCAC 02Q .0508(i)(8)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

# V. Inspection and Entry [15A NCAC 02Q .0508(I) and NCGS 143-215.3(a)(2)]

- 1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
  - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
  - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
  - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

- d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.
- Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.
- 2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

# W. **Annual Fee Payment** [15A NCAC 02Q .0508(i)(10)]

- 1. The Permittee shall pay all fees in accordance with 15A NCAC 02Q .0200.
- 2. Payment of fees may be by check or money order made payable to the N.C. Department of Environmental Quality. Annual permit fee payments shall refer to the permit number.
- 3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 02Q .0519.

# X. Annual Emission Inventory Requirements [15A NCAC 02Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

# Y. **Confidential Information** [15A NCAC 02Q .0107 and 02Q. 0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 02Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 02Q .0107.

# Z. Construction and Operation Permits [15A NCAC 02Q .0100 and .0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 02Q .0100 and .0300.

# AA. Standard Application Form and Required Information [15A NCAC 02Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 02Q .0505 and .0507.

### BB. Financial Responsibility and Compliance History [15A NCAC 02Q .0507(d)(4)]

The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

# CC. Refrigerant Requirements (Stratospheric Ozone and Climate Protection) [15A NCAC 02Q .0501(e)]

- If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or
  II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40
  CFR Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment
  according to the work practices, personnel certification requirements, and certified recycling and recovery equipment
  specified in 40 CFR Part 82 Subpart F.
- 2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
- 3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

### DD. Prevention of Accidental Releases - Section 112(r) [15A NCAC 02Q .0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

# EE. <u>Prevention of Accidental Releases General Duty Clause - Section 112(r)(1)</u> – FEDERALLY-ENFORCEABLE ONLY

Although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release.

# FF. Title IV Allowances [15A NCAC 02Q .0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

# GG. Air Pollution Emergency Episode [15A NCAC 02D .0300]

Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 02D .0300.

# HH. Registration of Air Pollution Sources [15A NCAC 02D .0202]

The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 02D .0202(b).

# II. Ambient Air Quality Standards [15A NCAC 02D .0501(c)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 02D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

# JJ. General Emissions Testing and Reporting Requirements [15A NCAC 02Q .0508(i)(16)]

Emission compliance testing shall be by the procedures of Section .2600, except as may be otherwise required in Rules .0524, .0912, .1110, .1111, or .1415 of Subchapter 02D. If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow the procedures outlined below:

- 1. The owner or operator of the source shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.
- 2. Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
- 3. The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
- 4. Two copies of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator.
  - a. The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
    - i. Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the specified method is inappropriate for the source being tested.
    - ii. Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.

- iii. Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in this Section if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.
- b. The Director may authorize the Division of Air Quality to conduct independent tests of any source subject to a rule in this Subchapter to determine the compliance status of that source or to verify any test data submitted relating to that source. Any test conducted by the Division of Air Quality using the appropriate testing procedures described in Section 02D .2600 has precedence over all other tests.

#### KK. Reopening for Cause [15A NCAC 020 .0517]

- 1. A permit shall be reopened and revised under the following circumstances:
  - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years:
  - additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
  - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. the Director or EPA determines that the permit must be revised or revoked to ensure compliance with the applicable requirements.
- 2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 02O .0513(c).
- 3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 02Q .0507, .0521, or .0522 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 02Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
- 4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
- 5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

# LL. Reporting Requirements for Non-Operating Equipment [15A NCAC 02Q .0508(i)(16)]

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. When permitted equipment is not in operation, the requirements for testing, monitoring, and recordkeeping are suspended until operation resumes.

### MM. Fugitive Dust Control Requirement [15A NCAC 02D .0540]

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas, stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

### NN. Specific Permit Modifications [15A NCAC 02Q .0501 and .0523]

- 1. For modifications made pursuant to 15A NCAC 02Q .0501(c)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
- 2. For modifications made pursuant to 15A NCAC 02Q .0501(d)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
- 3. For modifications made pursuant to 502(b)(10), in accordance with 15A NCAC 02Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (EPA Air Planning Branch, 61 Forsyth Street SW, Atlanta, GA 30303) in writing at least seven days before the change is made. The written notification shall include:

- a. a description of the change at the facility;
- b. the date on which the change will occur;
- c. any change in emissions; and
- d. any permit term or condition that is no longer applicable as a result of the change.

In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

# OO. Third Party Participation and EPA Review [15A NCAC 02Q .0521, .0522 and .0525(7)]

For permits modifications subject to 45-day review by the federal Environmental Protection Agency (EPA), EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 02Q .0518 begins at the end of the 45-day EPA review period.

### ATTACHMENT

# **List of Acronyms**

AOS Alternate Operating Scenario
BACT Best Available Control Technology

Btu British thermal unit CAA Clean Air Act

CAIR Clean Air Interstate Rule
CEM Continuous Emission Monitor
CFR Code of Federal Regulations
DAQ Division of Air Quality

DEQ Department of Environmental Quality
EMC Environmental Management Commission

**EPA** Environmental Protection Agency

**FR** Federal Register

**GACT** Generally Available Control Technology

**HAP** Hazardous Air Pollutant

MACT Maximum Achievable Control Technology

NAA Non-Attainment Area

NCAC North Carolina Administrative Code NCGS North Carolina General Statutes

**NESHAP** National Emission Standards for Hazardous Air Pollutants

**NO**x Nitrogen Oxides

NSPS New Source Performance Standard OAH Office of Administrative Hearings

**PM** Particulate Matter

PM<sub>10</sub> Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less

**POS** Primary Operating Scenario

PSD Prevention of Significant DeteriorationRACT Reasonably Available Control Technology

SIC Standard Industrial Classification SIP State Implementation Plan

SO<sub>2</sub> Sulfur Dioxide tpy Tons Per Year

VOC Volatile Organic Compound